

2023

# Modern Slavery Statement



## Acknowledgment of Country

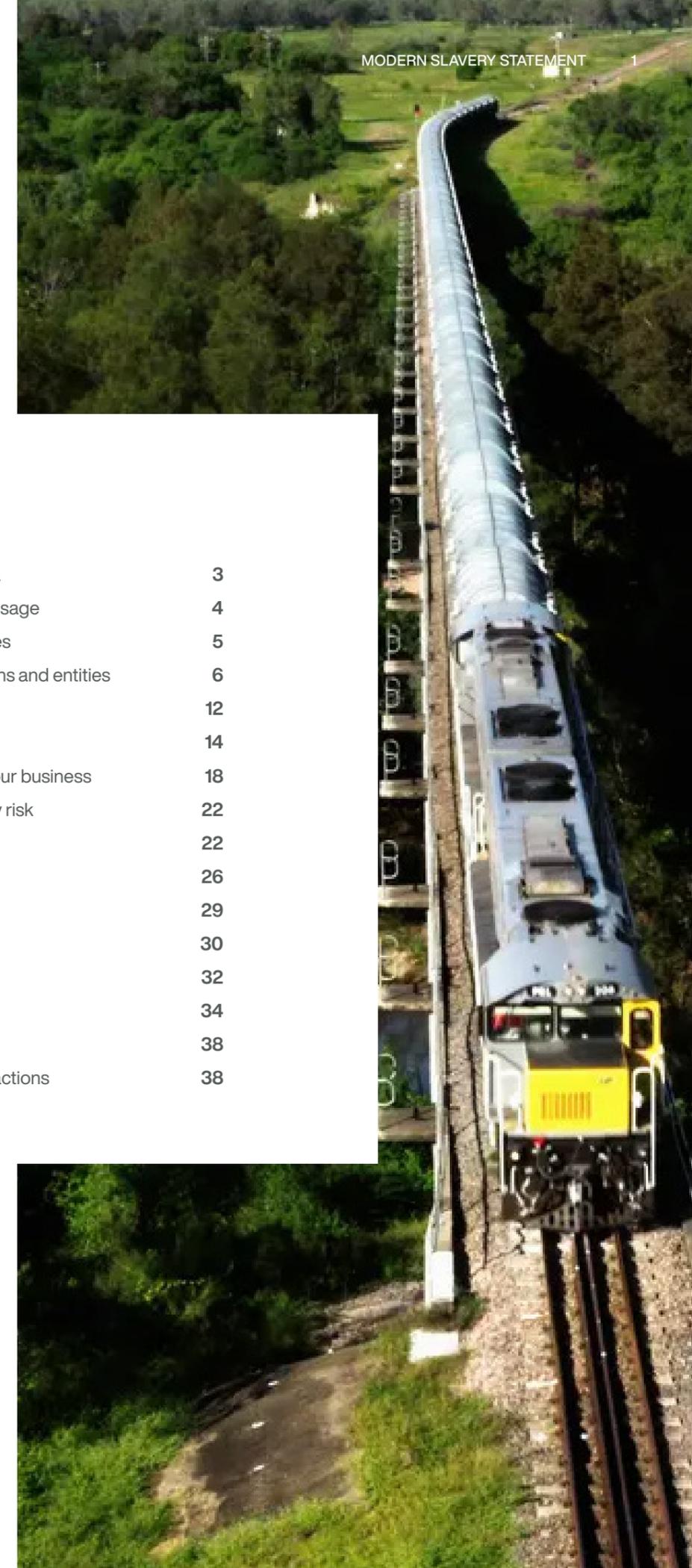
In the spirit of reconciliation, Qube acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respects to their elders past, present and emerging.

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### Disclaimer

This statement has been prepared by Qube Holdings Limited (Qube) on its behalf and on behalf of its reporting entities in relation to their activities during the 2023 financial year. Qube has prepared this document based on information available to it at the time of preparation and it does not purport to be complete or without error. This document should be read in conjunction with Qube's other periodic and continuous disclosure announcements lodged with the ASX, including Qube's FY23 Sustainability Report, Annual Report and Corporate Governance Statement.





# About this Statement

This Modern Slavery Statement has been prepared for the purpose of reporting in accordance with Qube's Human Rights Policy and section 16 of the Australian Modern Slavery Act 2018 (Act).

This joint statement is made by Qube Holdings Limited (Qube) for itself, as parent company and principal governing body of the Qube group of companies (Qube or the Qube Group), and on behalf of those entities constituting reporting entities as defined under the Act.

This statement describes the steps taken by the Qube Group to assess and address Qube's Modern Slavery risks and report these steps in accordance with the mandatory reporting criteria under the Act.

The reporting entities are the entities principally conducting supply chain operations within the Operating Division in Australia during the reporting period. The statement applies to the reporting entities and their controlled entities, being wholly owned subsidiaries and any controlled joint ventures of the Qube Group. This statement does not cover non-Australian Qube entities. Our reporting entities are set out on page 12.

## Compliance with mandatory criteria

CRITERIA	LOCATION	PAGE
Identify the reporting entity	Reporting entities	12
Describe the structure, operations and supply chains of the reporting entity	About Qube	6
	Our supply chains	14
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or control	Our supply chains	14
	Identifying Modern Slavery risks in our business	18
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Identifying Modern Slavery risks in our business	18
	Qube's approach to Modern Slavery risk	22
Describe how the reporting entity assesses the effectiveness of such actions	Our actions in FY23	34
Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation and approvals	32
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Chairman & Managing Director message	4



# Chairman & Managing Director message

On behalf of the Board, management team and Qube's 9,000-plus strong workforce, we are pleased to present this FY23 Modern Slavery Statement.

As a leading Australian logistics provider, our purpose is to help our customers, communities and industries to thrive. Working with our business partners, contractors and suppliers to prevent and mitigate Modern Slavery risks and impacts associated with our operations and supply chains is one of the many ways we deliver on this mission.

We acknowledge that addressing Modern Slavery risk is a complex task requiring specialised competencies, processes and industry collaboration, and we are committed to taking meaningful action to build the required capabilities within our business.

In FY23, we have taken a number of important steps to deepen our understanding of Modern Slavery and to strengthen our response.

Our key areas of action in FY23 include:

1. Assessing new acquisitions for Modern Slavery risk.
2. Engaging our joint-venture partners on Modern Slavery risks and sharing our resources, and consulting with large FMCG clients to deepen understanding of Modern Slavery risks in our collective supply chains.
3. Communicating an enhanced supplier code of conduct with high risk suppliers, setting clear expectations for how Qube and our suppliers will work together to continually improve human rights related practices.

4. Strengthening contractual controls with higher risk suppliers.
5. Progressing a risk assessment of our labour hire providers and acting on information received.
6. Continuing to embed Modern Slavery Policies and Framework training into relevant roles and responsible persons training programs, with a continued focus to educate Qube employees managing higher risk categories.
7. Ongoing engagement with our procurement teams to help them understand Modern Slavery risks and Qube's commitment to prevent and mitigate them.
8. Continuing to prioritise Modern Slavery risk at a Board level.

You will find further detail on these and other initiatives underway across the business in the following pages.



**Mr. Allan Davies (OAM)**  
Chairman



**Paul Digney**  
Managing Director

	What we said we would do	Our progress in FY23
 <b>Policy</b>	Annual review of the Supplier Code of Conduct.	✔ <b>Completed.</b>
	Annual review of Modern Slavery Statement.	✔ <b>Completed.</b> In preparing this year's Statement, Qube also consulted with subject matter experts on possible enhancements to this year's disclosure and potential further improvements in FY24 and beyond.
	New and emerging industries and areas of operation to be assessed for Modern Slavery risks.	✔ <b>Completed.</b> Businesses acquired in FY23 were assessed for Modern Slavery risk as part of our acquisition process.
 <b>Supplier</b>	Consultation with ten key suppliers identified with higher risk potential.	✔ <b>Completed.</b> Distributed Supplier Code of Conduct and questionnaire to a number of high risk suppliers. Follow-up discussions were undertaken with suppliers as required.
	Strengthen contractual controls with any higher risk supplier.	✔ <b>Completed.</b> Distributed Supplier Code of Conduct and questionnaire to a number of high risk suppliers. Procurement team engaged to discuss Modern Slavery and application of the questionnaire. Discussions were undertaken with suppliers as required.
 <b>Process</b>	Communication to suppliers regarding the Code of Conduct.	✔ <b>Completed.</b> Distributed Supplier Code of Conduct and questionnaire to a number of high risk suppliers. Discussions were undertaken with suppliers as required.
	Modern Slavery Clause to be drafted and inserted into standard purchase order terms and conditions.	✔ <b>Completed.</b> Completed as part of our due diligence when onboarding new suppliers and as part of our tender process via the Supplier Code of Conduct and questionnaire. Discussions were undertaken with suppliers as required.
 <b>People</b>	Review training and awareness content to ensure relevancy regarding Modern Slavery risks.	✔ <b>Completed.</b> Modern Slavery training delivered online to managers and supervisors, as part of induction process.
	Continue to ensure Modern Slavery training is undertaken by required personnel with a target of 100% compliance for in-scope participants.	✔ <b>Completed.</b> Training completed by 677 employees in FY23.

# About Qube, our structure, operations and entities

Qube is Australia's largest integrated provider of import and export logistics services, with a market capitalisation of \$5 billion at June 30, 2023.

We employ over 9,000 people, predominantly in Australia, New Zealand and South East Asia. Our purpose is to help our customers, communities, industries and people to thrive through a relentless focus on our five priorities – Safety, Wellbeing, Planet, Opportunity and Performance.

Our business is comprised of two core divisions: the Operating Division, and Qube's 50 per cent interest in Patrick Terminals — Australia's leading container terminal operator.

The Operating Division is comprised of two business units: Qube Logistics and Infrastructure and Qube Ports and Bulk.

## Qube Logistics and Infrastructure

Qube Logistics provides services covering road and rail transport, warehousing and distribution, container parks and related services and international freight forwarding services.

Qube Infrastructure includes ownership and operation of key terminals and infrastructure, including:

- Automotive and break-bulk terminals – through Australian Amalgamated Terminals (AAT). Qube provides automotive, general cargo and break-bulk facilities in Brisbane, Port Kembla and Melbourne.
- Grain terminals – through Quattro and Newcastle Agri Terminal. Qube operates multiuser grain storage and handling facilities in New South Wales.
- Rail terminals – the development and operation of import-export (IMEX) metro and regional terminals.



## Qube Ports and Bulk

Qube Ports provides port solutions and logistics services with bulk and general handling facilities in over 40 Australian, New Zealand and South East Asian ports. This allows Qube Ports to lead the market in providing purpose-designed solutions for customers handling containers, bulk, automotive and general cargo.

Qube Ports manages 25 sites for the forestry industry in Australia and New Zealand, and is also the leading provider of supply chain logistics services to the energy sector, supporting thousands of onshore wells and rig supply vessels, barges and offshore construction vessels annually. Qube Ports also has operations in Singapore and Indonesia.

Qube Bulk provides customers with the full range of bulk material handling services, including road and rail transport, stockpile management and bulk ship loading. Qube Bulk specialises in large-scale bulk export facilities and bulk material supply chains.

Complementing the existing Qube Bulk mine-to-market portfolio is the well-established remote bulk haulage business, Kalari, which Qube acquired in May 2023.

## Patrick Terminals

Qube owns a 50 per cent interest in Patrick Terminals, with the other 50 per cent owned by Brookfield and its managed funds. Patrick Terminals is an established and leading terminal operator providing container stevedoring services in the Australian market.

Patrick Terminals operates over four kilometres of quay line with 24 cranes and 130 straddles at four strategically located capital city ports around the Australian coastline. The network of terminals is located in the ports of Brisbane, Sydney, Melbourne, and Fremantle.



## Key stats

  
**9,000+**  
 direct employees

  
 180+ sites across  
 Australia, New Zealand,  
 PNG, Indonesia  
 and Singapore

  
 677 in-scope employees  
 completed Modern  
 Slavery training or  
 refresher training in FY23

  
 1,740 total Modern  
 Slavery training  
 completed modules

  
 14% female  
 participation rate

  
 reduction in  
 scope 1 greenhouse  
 gas emissions in FY23  
 (compared with  
 the prior year)

  
 reduction in scope 2  
 GHG emissions in FY23  
 (compared with  
 the prior year)

  
 18% reduction in  
 carbon intensity  
 (tCO<sup>2</sup>-e per \$M)

  
 Zero notifiable  
 environmental  
 incidents

# Our locations

## Workforce composition

Qube's workforce of more than 9,000 people work across our more than 180 locations in Australia, Papua New Guinea, New Zealand, Indonesia and Singapore.

In Australia, where a majority of our employees are based, nearly two thirds (62%) are employed in operational roles such as train or truck driving, crane or forklift operations or stevedoring. Nearly two thirds of our workforce are employed under an industrial instrument.

Similarly in New Zealand, around half of our employees (49%) are employed under equivalent collective employment agreements.

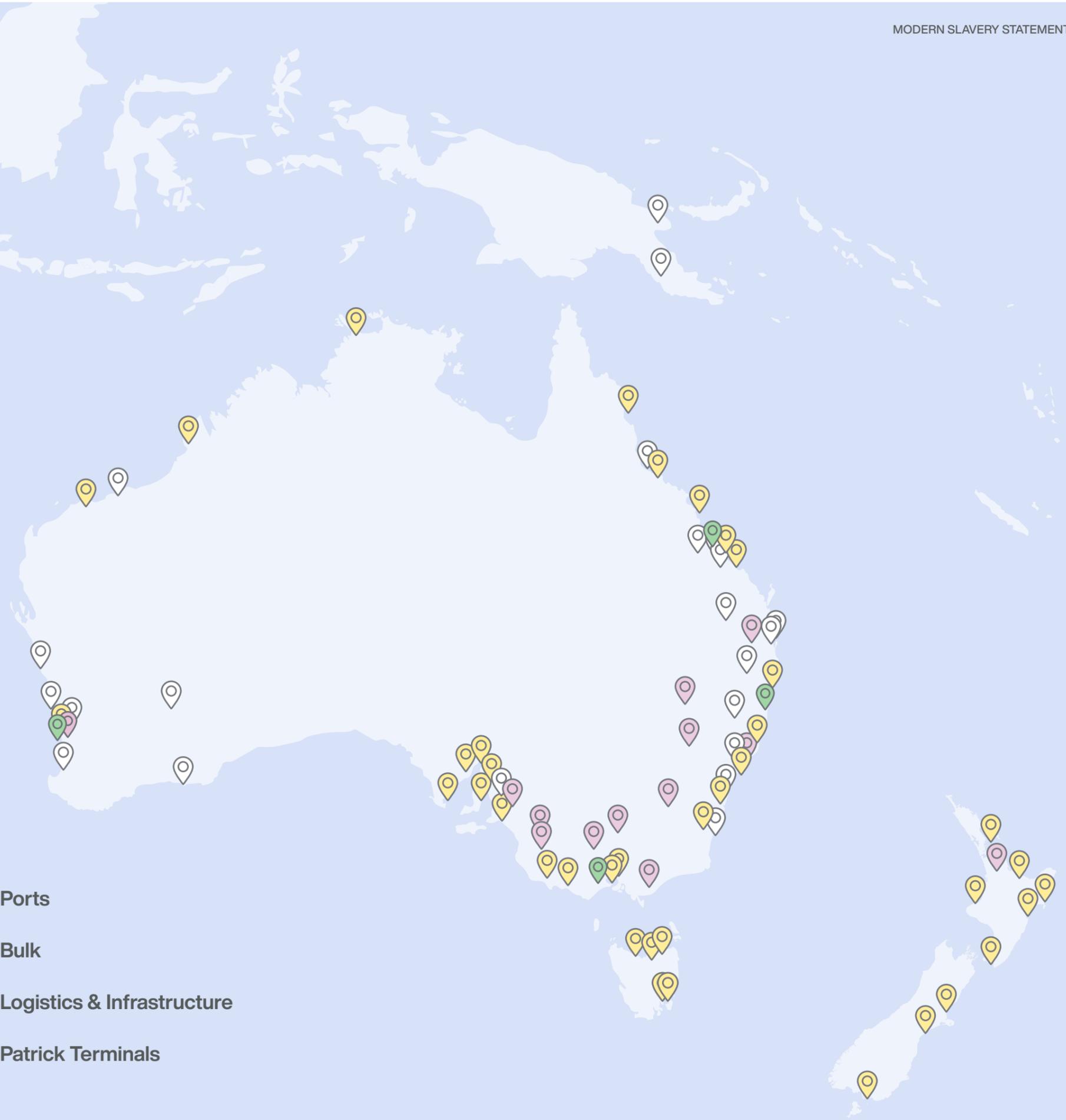
The remainder of our Australian and New Zealand employees, together with those employed in our other international locations (205 individuals), are employed directly with the Qube Group, and in some cases through specialist providers, under individual contracts between the Qube Group or with specialist providers.

## Employee composition<sup>1</sup>

LOCATION	TOTAL	% EMPLOYED UNDER AN INDUSTRIAL INSTRUMENT
PNG	64	0
NZ (not including Pinnacle)	1160	49
Indonesia	81	0
Singapore	60	0
Australia	8100	62

9465

-  Ports
-  Bulk
-  Logistics & Infrastructure
-  Patrick Terminals



## Reporting entities

Qube Holdings Limited is an Australian public company listed on the Australian Securities Exchange (ASX: QUB). Qube is the parent entity for the Qube Group and makes this statement on its behalf and on behalf of the Qube Group reporting entities, being relevant supply chain operating entities. These entities are set out as follows.



**Qube Holdings Ltd**  
(ABN 14 149 723 053)

**CTC Terminals Pty Ltd**  
(ABN 52 138 486 147)

**LCR Mining Group Pty Ltd**  
as trustee for the LCR Mining Group Trust  
(ABN 42 135 447 506)

**Maritime Container Services Pty Ltd**  
(ABN 69 001 169 240)

**Australian Amalgamated  
Terminals Pty Ltd**  
13098458229

**Qube Logistics (WA2) Pty Ltd**  
41130530111

**C&H Acquisition Pty Ltd**  
(ABN 48 600 205 909)

**Qube Logistics (Aust) Pty Ltd**  
(ABN 18 123 003 930)

**Qube Ports Pty Ltd**  
(ABN 46 123 021 492)

**Qube Logistics (SL) Pty Ltd**  
(ABN 90 004 935 915)

**Qube Logistics (SB) Pty Ltd**  
(ABN 83 003 307 319)

**LCR Group Pty Ltd**  
(ABN 78 095 626 798)

**Qube Logistics (SA) Pty Ltd**  
(ABN 43 087 193 299)

**Qube Logistics (VIC) Pty Ltd**  
(ABN 72 092 352 228)

**Giacci Bros. Pty Ltd**  
(ABN 66 008 708 361)

**Qube Bulk Pty Ltd**  
(ABN 13 138 868 756)

**Qube Ports (No 1) Pty Ltd**  
(ABN 74 128 404 900)

**Qube Logistics (Global) Pty Ltd**  
(ABN 71 123 236 260)

**Qube Logistics (QLD) Pty Ltd**  
(ABN 21 009 677 383)

**Qube Logistics (WA) Pty Ltd**  
(ABN 68 087 193 342)

**Qube Logistics (NSW) Pty Ltd**  
(ABN 99 123 022 588)

**Qube Logistics (WA1) Pty Ltd**  
(ABN 65 093 981 134)

**Qube Logistics (Rail) Pty Ltd**  
(ABN 63 082 313 415)

**Qube Logistics (QLDT1) Pty Ltd**  
(ABN 53 010 235 935)

**Qube Logistics (SA1) Pty Ltd**  
(ABN 21 008 263 474)

**Qube Energy Pty Ltd**  
(ABN 33 006 430 039)

**Qube Forestry Pty Ltd**  
(ABN 55 152 640 009)

**Quattro P Re Services**  
as trustee for the Quattro Grain Trust  
(ABN 63 472 949 145)

**Harvestco Australia Pty Ltd**  
(ABN 13 122 876 019)

**Qube Offshore Services Pty Ltd**  
(ABN 24 164 301 008)

**Bluwood Industries Pty Ltd**  
as trustee for the CSR Trust  
26099459809

**Kalari Proprietary Ltd**  
(ABN 14 004 595 395)

# Our supply chains

Qube maintains group-level policy and statutory performance criteria covering health, safety, environment, Modern Slavery and anti-bribery / corruption indicators. However, within our Operating Divisions, procurement is decentralised, meaning that each business unit is responsible for managing its own sourcing and procurement processes. This includes the procurement of capital assets and goods and services, and reflects the fact that each business unit has different and, in some cases, operationally specific procurement needs.

In FY23, Qube spent around \$478 million across its top 250 suppliers, with a majority of those suppliers based in Australia.

<b>Operating Division</b>	Qube Logistics & Infrastructure
	Qube Ports
	Qube Bulk
<b>Centralised Services</b>	IT services
	Facilities management
	IT software and hardware
	Cleaning and sanitation services



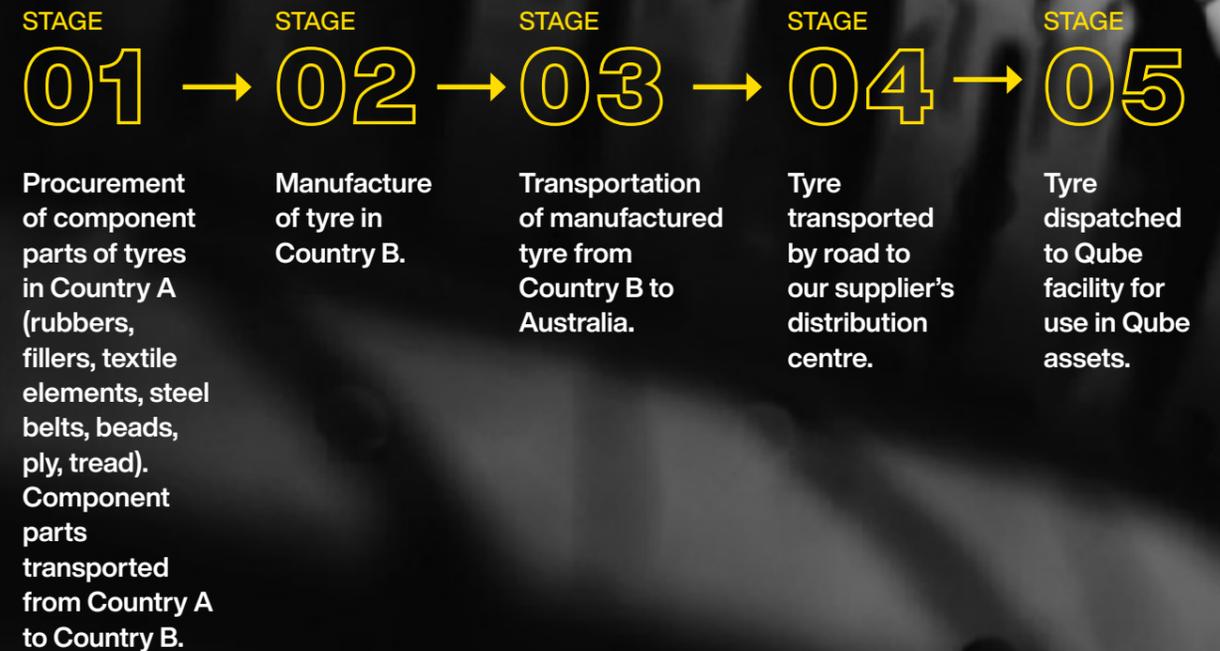
## CASE STUDY

### The tyre supply chain

We recognise that Modern Slavery risks in supply chains can often occur at tier two or below (that is, with suppliers with whom we do not directly contract). The complex and fast-moving nature of global supply chains can complicate efforts to understand and address these risks.

The flow chart below provides an example of the products, people and processes involved in the key stages of the global supply chain for the tyres used in our vehicles. Tyres are one of many types of products we procure, and we are working to increase our understanding of our extended supply chain across different procurement categories.

### Key stages of the global supply chain for tyres



# Procurement by division

## Logistics and Infrastructure

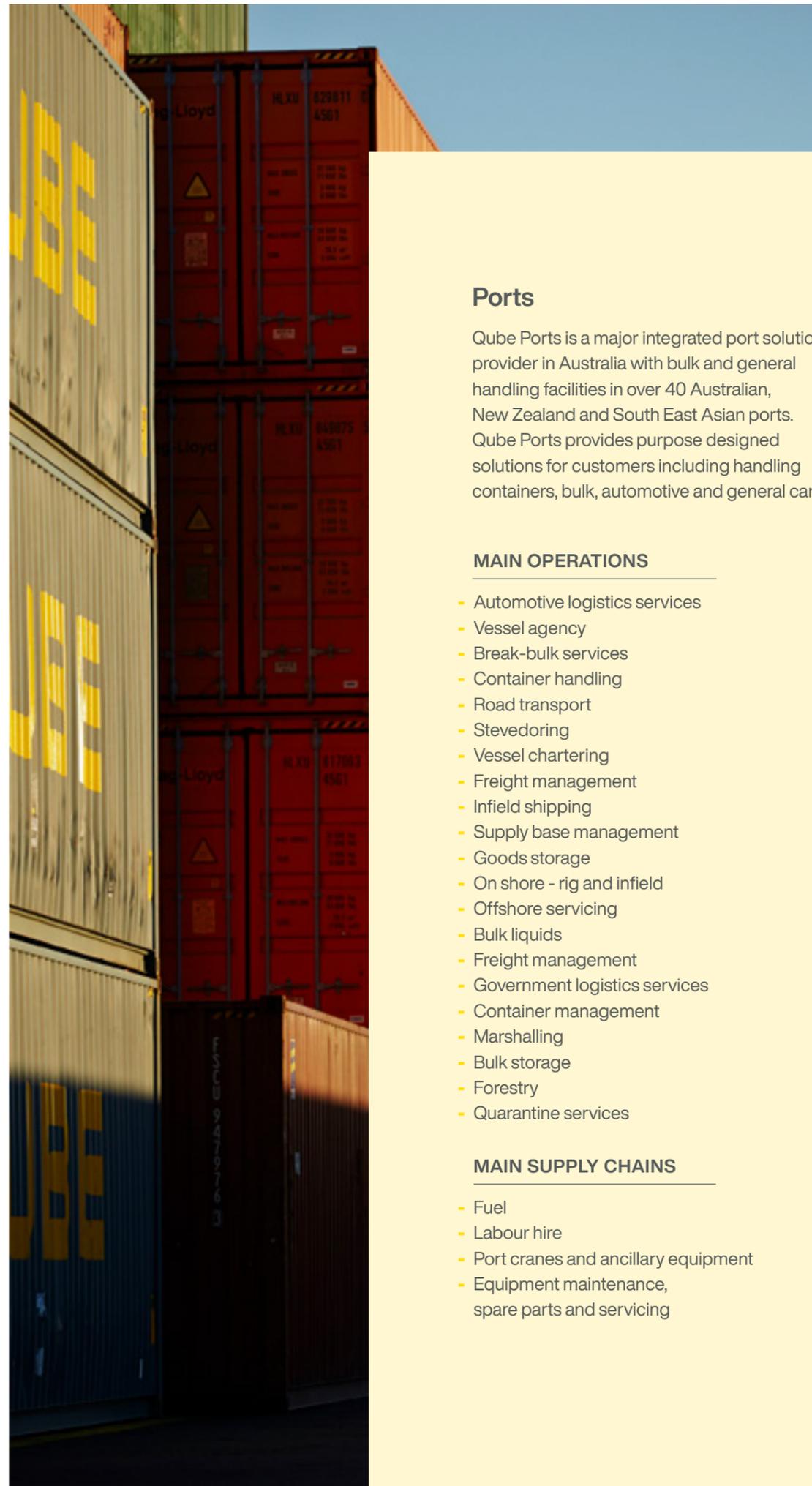
Qube Logistics and Infrastructure provides complete logistics services incorporating road and rail transport, warehousing and distribution, container parks and related services, intermodal logistics hubs including rail terminals and global services incorporating procurement, freight forwarding, import and export services.

### MAIN OPERATIONS

- Bagging services
- Procurement
- Global forwarding
- Container management
- Container transport
- Agri storage and handling
- Intermodal terminals
- Container rail
- Empty container parks
- Port assets
- Agri exports
- Bulk rail
- Domestic forwarding
- AQIS services
- Container hire and sales
- Project cargo storage
- Full container storage
- Terminals services
- VRail operating services
- Specialised transport
- Freight stations
- Container modifications
- Warehousing
- Palletised transport

### MAIN SUPPLY CHAINS

- Rolling stock (locomotives and wagons)
- Prime movers and trailers
- Road transport subcontracting
- Equipment maintenance, spare parts and servicing
- Tyres
- Fuel, oil and lubricants
- Labour hire



## Ports

Qube Ports is a major integrated port solutions provider in Australia with bulk and general handling facilities in over 40 Australian, New Zealand and South East Asian ports. Qube Ports provides purpose designed solutions for customers including handling containers, bulk, automotive and general cargo.

### MAIN OPERATIONS

- Automotive logistics services
- Vessel agency
- Break-bulk services
- Container handling
- Road transport
- Stevedoring
- Vessel chartering
- Freight management
- Infield shipping
- Supply base management
- Goods storage
- On shore - rig and infield
- Offshore servicing
- Bulk liquids
- Freight management
- Government logistics services
- Container management
- Marshalling
- Bulk storage
- Forestry
- Quarantine services

### MAIN SUPPLY CHAINS

- Fuel
- Labour hire
- Port cranes and ancillary equipment
- Equipment maintenance, spare parts and servicing

## Bulk

Qube Bulk provides complete mine-to-market and mine resupply solutions offering mine, road, rail, storage, port and ship services. Qube Bulk handles more than 85 million tonnes per annum of various bulk ores, concentrates, mineral sands, salt, coal and dangerous goods. It also delivers a range of tanker services from pneumatic operations for cement and lime, through to bulk liquid tankers for fuel and sulphuric acid.

### MAIN OPERATIONS

- Fuel transport
- On road transport
- Off road transport
- Terminal services
- De-bagging
- General cargo
- Rail services
- Project cargo
- Rota box
- Warehousing
- Reverse logistics
- Bulk exports
- Stockpile management
- Procurement
- Container leasing
- Bulk storage
- Container handling and storage
- Dangerous goods transport

### MAIN SUPPLY CHAINS

- Prime movers and trailers
- Earth-moving and mining equipment
- Equipment maintenance, spare parts and servicing
- Tyres
- Fuel, oil and lubricants
- Labour hire

# Identifying Modern Slavery risks in our business

To identify areas of high risk in our operations and supply chains, Qube considered four different Modern Slavery risk criteria as indicated below:

## Identified Modern Slavery risks

**1** High risk geographies (as identified by the global slavery index).

**2** High risk industries and categories.

**3** Intersection with vulnerable people.

**4** High risk business models.

Where multiple Modern Slavery risk factors co-exist, there is a higher likelihood of harm to people. On that basis, Qube has identified the following potential hot spots for salient human rights risks across our operations and supply chains in our operations:

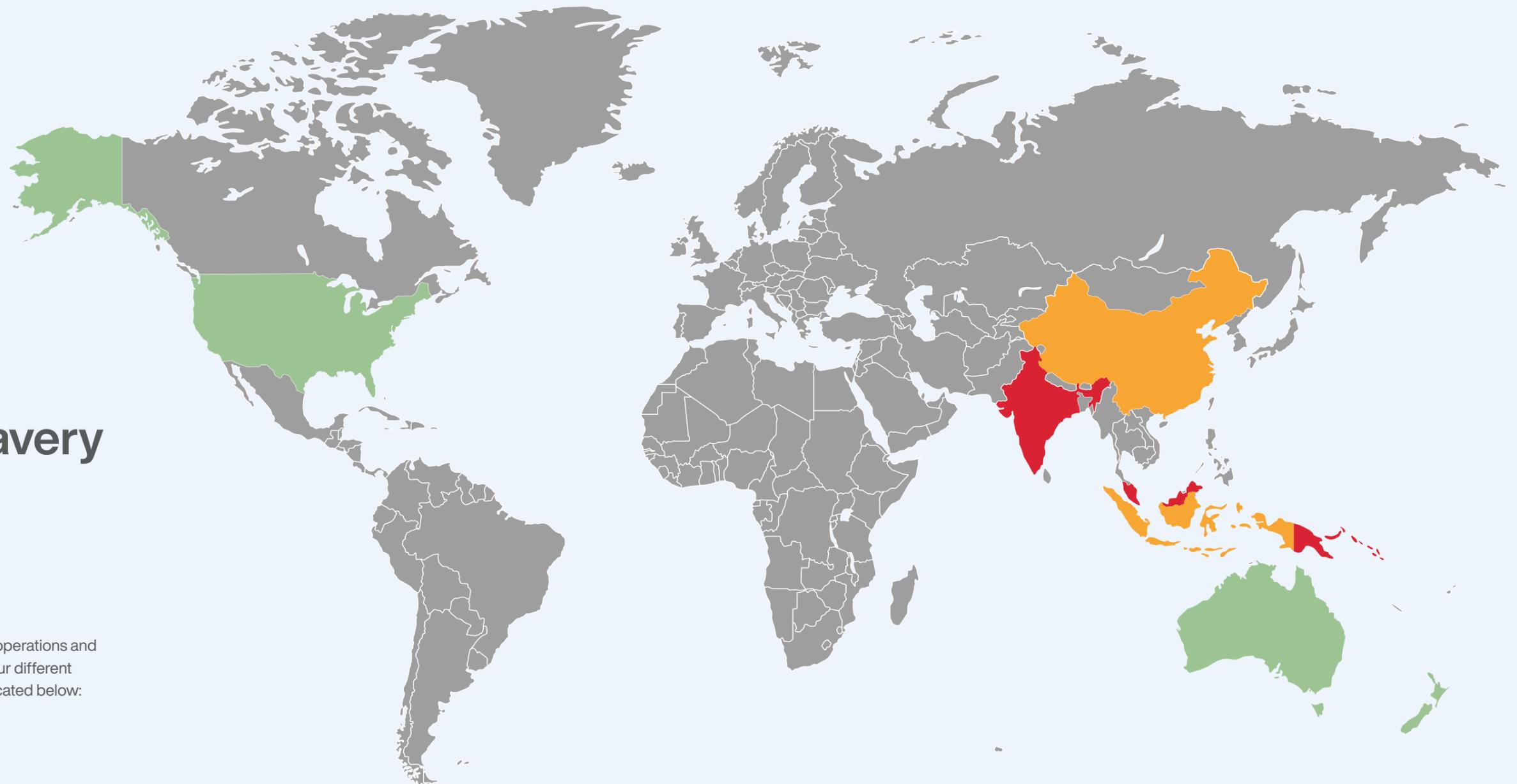
- Direct employment practices in our operations and joint ventures in countries with differing degrees of regulation as identified by the Global Slavery Index.
- We engage labour hire companies to support our operational requirements.
- Contractor employment activities associated with our infrastructure projects and facilities management.
- Some procurement categories that are known to have a higher prevalence of human rights and Modern Slavery risks in their industries such as textiles and operating equipment.

## Global slavery exposure

**LOW** AUSTRALIA  
NEW ZEALAND  
UNITED STATES

**MEDIUM** CHINA  
INDONESIA  
SINGAPORE

**HIGH** INDIA  
MALAYSIA  
PAPUA NEW GUINEA





# Risk heat map

To assist our understanding of the potential risks and ensure that we put in place appropriate mitigations, we have heat mapped these risks, as shown above.

**Risk**

LOW MEDIUM HIGH EXTREME



# Qube’s approach to Modern Slavery risk

## Governance

Our approach to managing the risks of Modern Slavery in our operations and supply chains is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and underpinned by Qube Group’s Human Rights and Modern Slavery Framework and Action Plan (Framework and Action Plan), together with relevant policies and procedures is detailed in the following pages.

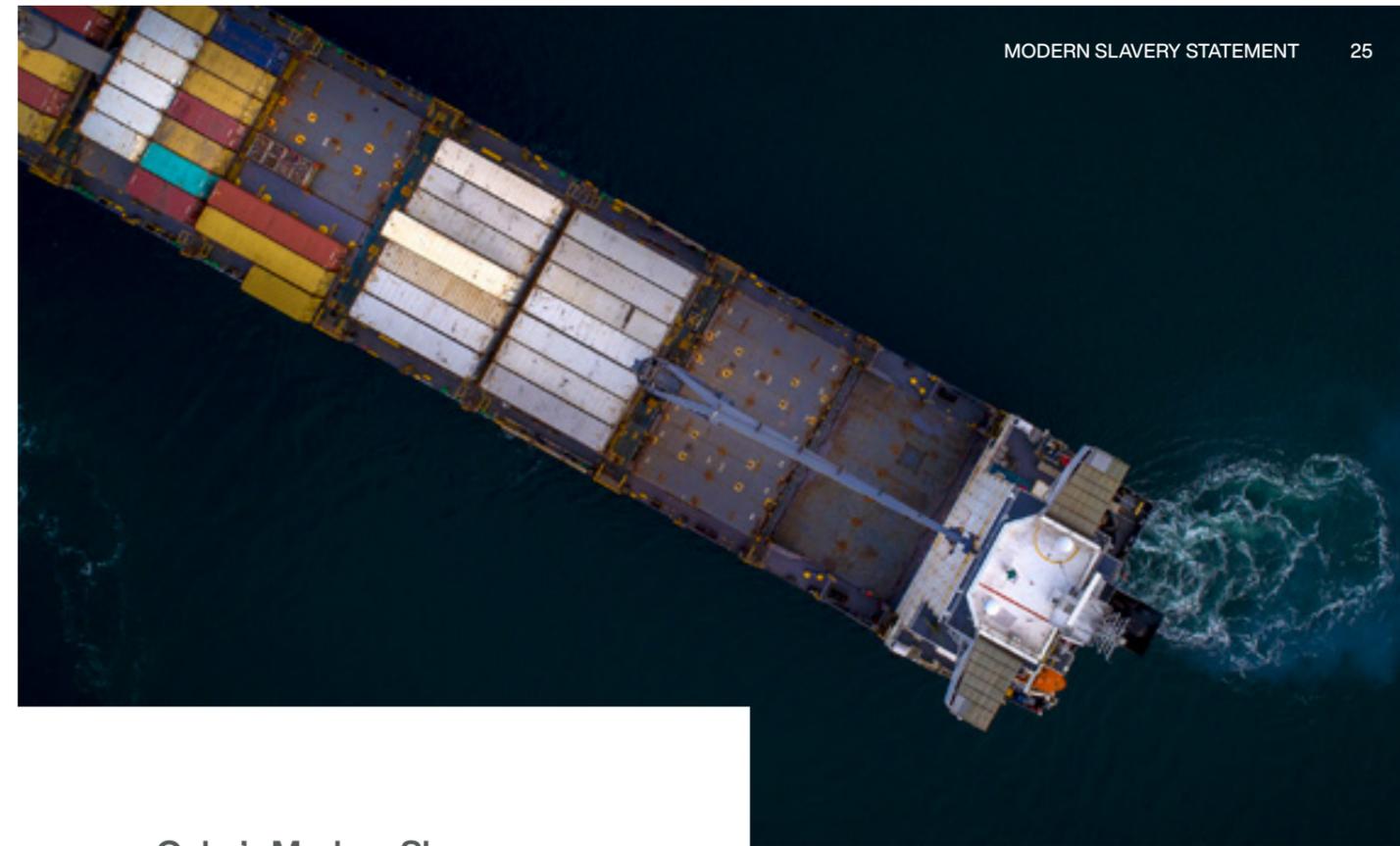
The Qube Board is regularly briefed on Qube’s Modern Slavery risks and wider human rights risk management, and oversees Qube’s progress on implementing the Framework and Action Plan through reporting from the relevant Board committee.

Our commitment to respecting human rights is integrated into our corporate governance and management processes is as follows:

## Management process

ROLE	ACCOUNTABILITY
Qube Board	Oversees progress on implementing the Framework and Action Plan through reporting from the relevant Board Committee.  Approves Qube’s Human Rights Policy and Modern Slavery Statements.
Safety, Health and Sustainability Committee (SHS Committee)	The Board Committee is responsible for reviewing the Human Rights Policy, monitoring implementation of, and performance under, the Framework and Action Plan and reporting of progress (and any material concerns) to the Qube Board.
Executive	Monitors progress on implementation of the Framework and Action Plan and supports business divisions on implementation.  Promotes awareness and delivers training on the Human Rights Policy and Qube’s commitments in relation to human rights and requirements under the Framework and Action Plan.  Develops and maintains oversight of grievance and remediation responses.
Risk management	Includes human rights risks (i.e. harm to people and risks to Qube) in Group and divisional human rights risk management processes.
Procurement	Integrates the consideration of human rights risks into all procurement processes.
Management	Responsible for assessing and implementing actions to mitigate human rights risks (particularly with respect to Modern Slavery) in the Qube Group’s day-to-day operations in line with this policy and the Framework and Action Plan.
General Manager - Safety, Health & Sustainability	The Human Rights Policy owner.  Develops and maintains the Framework and Action Plan.  Monitors and reports on human rights and Modern Slavery matters to the SHS Committee.  Provides support to business units and liaises with the Executive and management on human rights risks, particularly Modern Slavery.  Reports progress on the Framework and Action Plan in Qube’s annual Sustainability Report.  Prepares, in consultation with Qube management and reporting entities, Qube’s annual Modern Slavery Statement.

# Governance, implementation and reporting



## Qube's Modern Slavery Framework and Action Plan involves the following:

- Complying with the laws in the jurisdictions in which we operate. However, if there are differences between this policy and those laws, then we will apply the higher standard.
- Applying findings from risk-based assessments to decide when increased due diligence and focus is required in particular areas of our supply chains.
- Using our management processes and influence to prevent and mitigate 'harm to people'.
- Maintaining a grievance mechanism to allow those adversely affected to raise concerns.

This means:

- Avoiding causing, or contributing to, adverse human rights impacts through the Qube Group's own business activities and addressing such impacts if they do occur.
- Seeking to prevent or mitigate adverse human rights impacts associated with third party relationships that are directly linked to Qube's operations and services.
- Enhancing our capabilities by collaborating with government, civil society organisations and industry.
- Building our employees' understanding and capabilities to assess and manage human rights risk on a day-to-day basis.
- Reporting our progress in meeting our human rights policy commitments in a transparent manner.
- Treating human rights risk as a business risk that needs to be assessed and managed by integrating a human rights lens into risk management processes at all relevant operational levels.
- Investigating and reporting on whistleblowing incidents.
- Conducting due diligence to assess the potential human rights risks in our operations and supply chains and focusing on the most salient human rights risks through adoption of a risk-based approach.

# Policies

Qube's policies and procedures apply to all controlled entities of the Qube Group and to those joint ventures over the activities of which Qube exercises operational control. Our policies clearly articulate the standards we expect from our people, our suppliers and our partners, including in relation to Modern Slavery risk.

Qube's approach is to integrate the assessment and prevention of Modern Slavery risks into our core governance, policy and risk management frameworks, management systems and processes. They include:

- **Our Safety, Health and Sustainability Committee Charter and Safety, Health and Sustainability Policy** which was adopted in 2021, establishes a clear governance structure and commitment to embed human rights and Modern Slavery considerations into our operations, including our procurement process and approach to significant infrastructure developments.

As part of Qube's culture, we are committed at all levels of the organisation to providing a safe and healthy workplace to conduct business in a way that minimises the risk of harm to people, helps protect the environment and sustains the communities in which we operate. This is a shared responsibility that everyone at Qube is accountable for, and must contribute to meeting the aims set out in this policy.

- **Our Statement and Values, Code of Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy and Human Rights Policy** provides a practical set of guiding principles to help our people to act lawfully and ethically in accordance with Qube's values and culture. Principles such as honesty and integrity, treatment of others, privacy and confidentiality and reporting breaches sets an expectation for Qube to work within a strong ethical framework.

- **Our Human Rights Policy** which was issued in 2021, is informed by the goals and practices outlined in the UN Guiding Principles on Business and Human Rights (UN Guiding Principles).

Like many businesses, it is our view that addressing Modern Slavery impacts is best achieved by managing these as a sub-set of a broader suite of human rights risks pertinent to our business operations and across our supply chains.

- **Our Safety, Health and Sustainability Management System (SHS Management System)** as part of our overall risk management framework provides a platform for comprehensive and efficient management processes, responsibilities, internal controls and Board oversight of Qube's major risks including human rights and Modern Slavery risks. We ensure all incidents (actual or potential) are reported and investigated to prevent recurrence and information on lessons learned is shared.

- **Our Whistleblower Policy** promotes and supports a culture of honest and ethical behaviour by setting out the process for reporting concerns and the support, protections and remedies which persons may be eligible to access in respect of reporting for all Qube employees, contractors, suppliers and consultants. The protocols and reporting regime include the human rights grievance reporting.

Qube has a number of channels for making a report if a person becomes aware of any issue or behaviour which they consider to be a reportable matter under this policy including via email, a webform, in writing or via a dedicated phonenumber. Reports can be made anonymously. A senior HR or SHS member will, upon the Whistleblower's request, be assigned to support the Whistleblower and to act as a liaison between the Investigator and the Whistleblower (Whistleblower Support Officer). Whistleblower Support Officers assist with the protection of Whistleblowers from detrimental treatment because they have made or are considering making a report under this policy. Qube also supports Whistleblowers by providing access to a confidential support and counselling service, the Employee Assistance Program (EAP).

## Documents

The above documents are publicly available within the corporate governance section of Qube's website at: [www.qube.com.au/about/corporate-governance](http://www.qube.com.au/about/corporate-governance). We are committed to continually improving and refining these policies to ensure they remain fit for purpose.





## Training

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In FY23, a further 677 employees received Modern Slavery training or completed refresher training.

Online training with respect to Modern Slavery risk is a key component of our onboarding process and new employees – including those who joined Qube through acquisitions during this period – were required to complete Qube's Modern Slavery training module.

In addition, face-to-face discussions were held with employees who may have direct exposure to Modern Slavery risks in their procurement activities, to ensure they are aware of the risks and the steps that should be taken should they identify any areas of concern.

Qube welcomes feedback from its employees on the value and effectiveness of our Modern Slavery training. We believe this is key to ensuring that training is both embedded into our standard operating procedures and sets up our people and our business for success.

# Working with our suppliers

Qube shares its commitment, values and expectations with respect to our suppliers through its Supplier Code of Conduct which is provided to new suppliers and is available on our website.

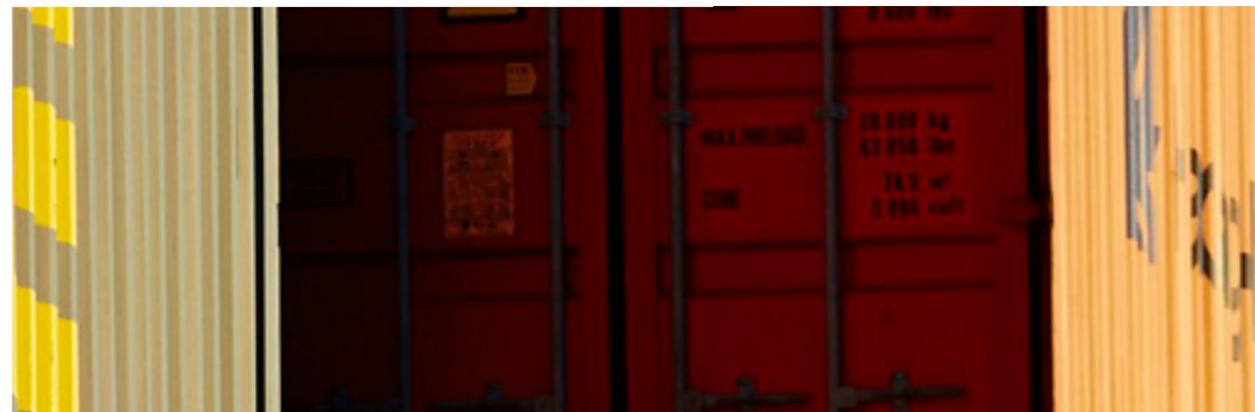
Qube requires its suppliers to conduct their own due diligence to convey their expectations and requirements to their suppliers down the supply chain. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of the supplier relationships.

Suppliers are expected to:

- Not engage in any practices that constitute Modern Slavery including forced or compulsory labour, trafficking in persons, debt bondage and child labour – both within its activities and undertakings and within its supply chain. Qube requires its suppliers to respect Human Rights and ensure that they are not complicit in Human Rights abuses.
- Ensure their employees are paid at least the minimum wage required by local law or the prevailing industry wage – when available, whichever is higher – and must provide all legally mandated benefits requirements.
- Ensure migrant workers have exactly the same entitlements as local employees. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the employee to submit his/her/their original identification documents. Deposits are not allowed. Workers engaged by a supplier through an agent or contractor of the supplier are the responsibility of the supplier.

Qube has established four Modern Slavery related documents that are provided to our suppliers:

- Supplier Commitment Letter – The Supplier Commitment Letter is sent out to suppliers as the cover package for the remainder of the Modern Slavery documentation. It serves as a guide that explains the purpose of Modern Slavery action, Qube's expectations and actions required.
- Modern Slavery Statement – Qube's Modern Slavery Statement outlines Modern Slavery risks, along with the systems in place to assess and manage them. It further details the development of a Human Rights and Modern Slavery Framework and Action Plan.
- Supplier Code of Conduct – Commits both the supplier and Qube to working in partnership to strive to meet and exceed the expectations and described in the Code.
- Supplier questionnaire – The questionnaire serves the purpose of identifying any Modern Slavery risks across the supplier's supply chain and addressing such risks appropriately.



## CASE STUDY

### Responding to allegations of improper conduct in overseas recruitment

During FY23, Qube was alerted to allegations that a recruitment agency that we had used to assist in sourcing overseas labour for some of our Australian operations may have acted improperly with respect to its sourcing practices, including charging candidates placement fees.

The allegations pertained to the practices of the agency generally and were not specific to any candidates employed by Qube.

Qube immediately commenced an investigation into the claims, including conducting interviews with each employee who had joined Qube with the assistance of the agency. None identified as having been subjected to the alleged improper conduct, however each was offered confidential support and financial counselling. Qube also engaged directly with the agency involved on the allegations, which remain the subject of separate legal action.

We also reviewed our own practices with respect to sourcing overseas employees via recruitment agencies and we identified opportunities to strengthen our due diligence of international recruitment placement agents. Qube has now implemented a number of changes to our policies and procedures in response.

## CASE STUDY

### Responding to allegations concerning an external labour hire provider

In February 2023, Qube was alerted to the alleged underpayment of a vulnerable worker in an external labour hire business occasionally engaged by Qube to assist with container unpacking.

The claims included allegations that a labour hire agent had made promises with respect to terms and conditions of employment which had not been fulfilled, and allegations that the worker was not paid within the verbally agreed timeframe.

Upon being alerted to these allegations, Qube immediately assisted the worker involved in understanding their rights, including their ability to seek redress via the FairWork Ombudsman. Qube assisted the employee in contacting the Ombudsman.

Qube also immediately contacted the employer to discuss the allegations and reviewed the commercial arrangements between Qube and the labour hire supplier. On the basis of that investigation and our dissatisfaction with the processes, procedures and practices identified, a decision was taken to discontinue any relationship between Qube and the labour hire business in question.

Qube is now also actively cooperating with relevant authorities who are separately investigating these allegations against the labour hire business.

In response to this incident, Qube has conducted a legal review of existing arrangements with its external labour hire providers to ensure we mitigate risks for labour hire employees and our business. We have also strengthened our requirements with respect to labour hire engagements.

# Consultation and approvals

Qube operates under a common set of governance policies and guiding principles which includes our approach and actions to eliminate the risk of Modern Slavery. This Statement has been prepared through a cross-functional collaboration and in consultation with the key working groups across Qube, including the reporting entities that are owned or controlled.

The boards of directors of all the reporting entities comprise a small number of common officeholders who are members of Qube Holdings' senior management team and directors of the various business divisions. The reporting entities within a division are closely related and effectively operate as one business within that division. By virtue of their senior executive management positions, the officeholders of these companies have a deep understanding of Qube's businesses, operations and supply chains.

The Statement was reviewed by the Modern Slavery working group and the Qube executive team, which is responsible for the day-to-day management of our business units.

The Safety, Health and Sustainability Committee endorsed this Statement as part of its human rights and Modern Slavery reporting to the Board of Directors of Qube Holdings Limited. The Qube Board subsequently approved this Statement on 22 November 2023.

# Modern Slavery consultation overview

## OUR POLICY

**Clear commitment to eliminating Modern Slavery.**

## OUR SUPPLIERS

**Current and potential suppliers committed to eliminating Modern Slavery.**

## OUR PROCESS

**Operational policies and processes regarding Modern Slavery.**

## OUR PEOPLE

**Capable and trained to help in eliminating Modern Slavery.**

The Qube Group holds a 50% interest in Patrick Terminals (PTH No 1 Pty Ltd) that operates outside of the Qube Group and produce their own Modern Slavery statement under the Modern Slavery Act 2018.



# Our Actions in FY23

## ✓ 1. Assessing new acquisitions for Modern Slavery risk.

In FY23, Qube assessed all new acquisitions for Modern Slavery risk as part of the acquisition process.

As online training, with respect to Modern Slavery risk, is a key component of our onboarding process, our new employees who joined Qube through acquisition were required to complete Qube's Modern Slavery training module.

## ✓ 2. Engaging our joint-venture partners on Modern Slavery risks, sharing our resources and consulting with large FMCG clients to deepen understanding of Modern Slavery risks in our collective supply chains.

Qube shares its commitment, values and expectations with respect to our suppliers through its Supplier Code of Conduct which is provided to new suppliers and is available on our website.

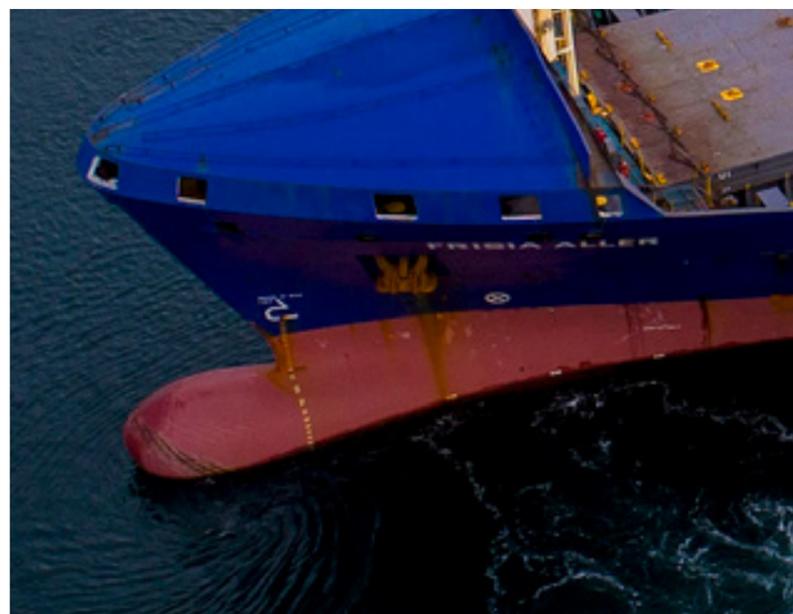
Qube has established four Modern Slavery related documents for our suppliers and is distributed using the following steps:

- Supplier Commitment Letter – The Supplier Commitment Letter is sent out to suppliers as the cover package for the remainder of the Modern Slavery documentation. It serves as a guide that explains the purpose of Modern Slavery action, Qube's expectations and actions required.
- Modern Slavery Statement – Qube's Modern Slavery Statement outlines Modern Slavery risks, along with the systems in place to assess and manage them. It further details the development of a Human Rights and Modern Slavery Framework and Action Plan.

- Supplier Code of Conduct – commits both the supplier and Qube to working in partnership to strive to meet and exceed the expectations and described in the Code.
- Supplier questionnaire – The questionnaire serves the purpose of identifying any Modern Slavery risks across supplier's supply chains and addressing such risks appropriately.

## ✓ 3. Communicating an enhanced Supplier Code of Conduct with high risk suppliers, setting clear expectations for how Qube and our suppliers will work together to continually improve human rights related practices.

Qube requires its suppliers to conduct their own due diligence to convey their expectations and requirements to their suppliers down the supply chain. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.



Suppliers are expected to:

- Not engage in any practices that constitute Modern Slavery including forced or compulsory labour, trafficking in persons, debt bondage and child labour – both within its activities and undertakings and within its supply chain. Qube requires its suppliers to respect human rights and ensure that they are not complicit in human rights abuses.
- Ensure their employees are paid at least the minimum wage required by local law or the prevailing industry wage – when available, whichever is higher – and must provide all legally mandated benefit requirements.
- Ensure migrant workers have exactly the same entitlements as local employees. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the employee to submit his/her/their original identification documents. Deposits are not allowed. Workers engaged by a supplier through an agent or contractor of the supplier are the responsibility of the Supplier.

In FY23, we distributed our supplier code of conduct and questionnaire to a number of new suppliers and as part of our standard tender processes.

The information provided in response was thoroughly reviewed and where potential areas of concern were identified, Qube undertook follow-up conversations with relevant suppliers to ensure they understood the potential for Modern Slavery risk within their business or supply chain and to ensure that we could be satisfied that Modern Slavery risks were being appropriately managed or mitigated.



# Our Actions in FY23



## 4. Strengthening contractual controls with higher risk suppliers

In FY23, we undertook an internal legal review of contractual clauses with a number of suppliers, including with respect to labour hire to ensure we mitigate risks for labour hire employees and our business. This had the effect of strengthening our contractual controls with higher risk suppliers.

## 5. Progressing a risk assessment of our labour hire providers and acting on information received

In FY23, we reviewed our own practices with respect to sourcing overseas employees via recruitment agencies and we identified opportunities to strengthen our due diligence of international recruitment placement agents. Our processes and procedures have now been updated. In addition, we conducted a legal review of existing arrangements to ensure we mitigate risks for potential candidates and our business.

## 6. Continuing to embed Modern Slavery Policies and Framework training into relevant roles and responsible persons training programs with a continued focus to educate Qube employees managing higher risk categories

Qube's Modern Slavery procedure is being embedded across the business with an additional 677 employees having received training or completed refresher training in FY23.

Training is required to comply with the content of this procedure, via Rapid Induct system. The training module is designed to provide users with a general understanding of Modern Slavery. The module details compliance and reporting obligations under the Modern Slavery Act 2018 (Cth).

The following roles are required to complete this training:

- Managers and supervisors
- SHS teams, advisors and managers
- Regional and general managers and executive team members
- Contract and procurement managers

## 7. Ongoing engagement with our procurement teams to help them understand Modern Slavery risks and Qube's commitment to prevent and mitigate them

Modern Slavery requirements have been integrated into our procurement processes since FY22. Our processes are informed by our human rights and Modern Slavery gap analysis and risk assessment, and suppliers are engaged to complete a Modern Slavery supplier questionnaire which informs Qube's understanding of potential Modern Slavery risks.

Qube's capital investment review and approval process includes a specific requirement to consider environmental, social and corporate governance impacts.

Items required to be considered in the capital investment review and approval process are (but not limited to):

- Wider social considerations including relevant risks / opportunities, including Modern Slavery risk.
- Wider governance considerations including risks.
- Wider environmental considerations including risks.
- Assessing if the goods or services have energy efficiency targets and what plans are in place to achieve them.
- Assessing if the goods or services are the most sustainable within the market.
- Assessing the sustainability metrics of their products including their carbon footprint.
- Assessing if the products use can use an alternative energy source. This is ongoing as it is now included in the capital investment process.

## 8. Continuing to prioritise Modern Slavery risk at a Board level

The Qube Board is regularly briefed on Qube's Modern Slavery risks and wider human rights risk management, and oversees Qube's progress on implementing the Framework and Action Plan through reporting from the relevant Board committee.



## Planned actions for FY24

Continue to evolve our approach to Modern Slavery risk including by engaging external expertise.

Conduct an internal assurance process on Qube's approach to responsible sourcing.

Investigate a responsible sourcing certification scheme.

Evolve our due diligence processes with respect to Modern Slavery risk, particularly with higher risk suppliers and/or geographies.

Review our Modern Slavery education and training packages to ensure they reflect best practice.

Benchmark our approach to Modern Slavery against our peers.

Strengthen our engagement with joint-venture partners and associates.

Continue conversations with clients about Qube's approach to Modern Slavery and expectations of suppliers and partners.

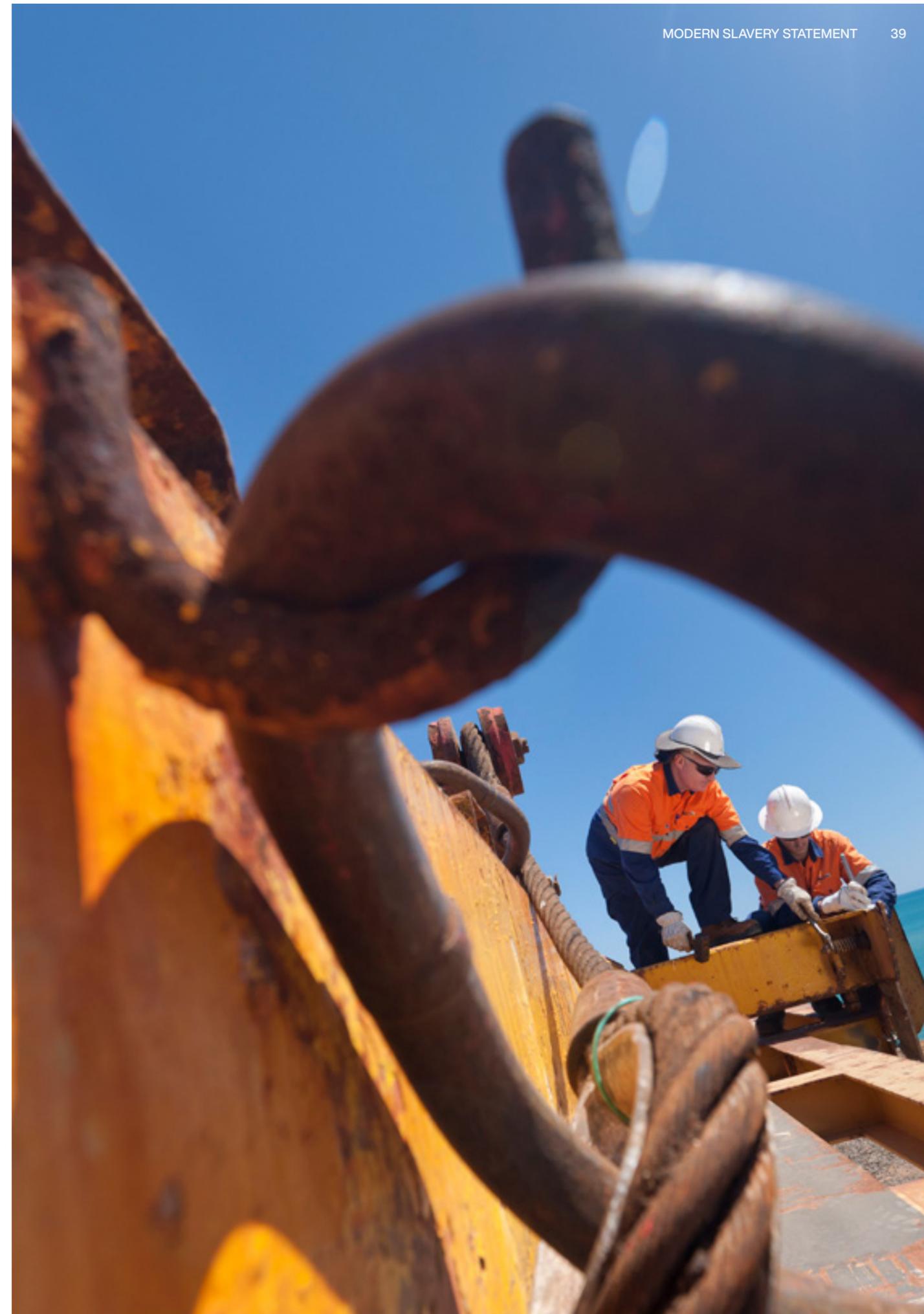
### Assessing the effectiveness of our actions

Qube regularly reviews the effectiveness of our actions to assess Modern Slavery risk management and controls through a number of mechanisms, and reflects our commitment to embed human rights and Modern Slavery considerations into our operations, including our procurement process and approach to significant infrastructure developments.

Reporting is provided to the Qube Board and Safety, Health and Sustainability Committee along with regular reporting to the executive leadership team.

#### The actions taken to assess our effectiveness include:

- Conducting an annual review of new or emerging Modern Slavery risks.
- Regular review of key policies and procedures to evaluate they remain fit for purpose.
- Engaging and collaborating with key stakeholders and suppliers.
- Assess and monitor complaints and grievances lodged through our grievance processes to identify any possible Modern Slavery involvement.
- Regularly assess the completion rate of awareness training and education packages.
- Regularly assess that the training and awareness packages completed by internal and external stakeholders is appropriate, fit for purpose, appropriate to participant needs and levels of understanding of human rights and Modern Slavery.
- Business operating units report on risk management on a regular basis.



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