

Modern Slavery Statement

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1 Introduction

This Modern Slavery Statement is for Abbot Point Operations Pty Ltd ABN 58 605 852 060 (**APO**) and Abbot Point Bulkcoal Pty. Ltd. ABN 23 010 183 534 (**APB**) (together **APO Group**) which are reporting entities under the *Modern Slavery Act 2018* (Cth) (the **Act**). This is the joint statement for the APO Group.

The APO Group is committed to the highest levels of ethical business practices and is devoted to understand and combating the risk of modern slavery in our supply chains and in any part of our business.

This Modern Slavery Statement is prepared in accordance with the Act and describes the risks of Modern Slavery in APO Group's business, steps we have taken and planning of the next steps to be taken during the financial year, ended 31 March 2021, to identify manage and mitigate the risks in our operations and supply chains and how we evaluate the effectiveness of our responses.

For the purposes of this statement, references to 'We', 'Us', and 'Our' collectively refers to APO Group and each of its reporting entities covered by the statement.

2 Modern Slavery Law

The Act identifies seven (7) relevant mandatory criteria which APO Group's Modern Slavery Statement must address, as follows:

- (a) identify the reporting entity;
- (b) describe the reporting entity's structure, operations and supply chains;
- (c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity;
- (d) describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes;
- (e) describe how the reporting entity assesses the effectiveness of these actions;
- (f) describe the process of consultation with any entities that the reporting entity owns or controls; and
- (g) any other information the reporting entity considers relevant.

3 The APO Group Structure, Operations and Supply Chains

3.1 Structure

APO is an Australian Proprietary Company that was established in 2015 and is based in Bowen, Queensland. Adani Ports and Special Economic Zone Ltd is the ultimate holding company of APO. APO is controlled by Adani Ports and Special Economic Zone Ltd.

APB is an Australian Proprietary Company that was established in 1980 and is based in Bowen. Adani Ports and Special Economic Zone Limited is the ultimate holding company of APB. APB is controlled by APO.

3.2 Operations

North Queensland Export Terminal (**NQXT**) is the owner of the Abbot Point Coal Terminal (**Terminal**). The Terminal is the most northern coal port in Australia, located within the port of Abbot Point approximately 25 kilometres north of Bowen, at the northern end of the Bowen and Galilee Coal Basins.

The Terminal is a dedicated coal export terminal comprising a dual rail inloading facility, coal handling and stockpiling areas comprising three bunds capable of being serviced by six (6) stacker reclaimers and a 2.8 kilometre trestle jetty and conveyors connecting to two (2) off-shore berths and two (2) shiploaders.

APO has been contracted by NQXT to manage the operations at the port of Abbot Point (**O&M Contract**). APB performs services for the management of operations at the terminal pursuant to a sub-contract (**OMC Subcontract**).

As at the date of making this statement, APO Group has 180 employees based in the port of Abbot Point, the town office based in Bowen and the office based in Brisbane CBD. Employees are employed under individual contracts or an enterprise agreement which has been approved through Fair Work Australia processes.

3.3 Supply Chains

As the owner of the Terminal, NQXT have entered into long term contracts with users of the Terminal (**User Agreements**) which provides the users with a right to access and present coal for handling at the Terminal. APO works collaboratively with the users and build long term partnerships to achieve the user's expectations of responsiveness, flexibility and reliability.

APO Group continues to enhance its processes and implement new processes aimed at ensuring that we only work with appropriate suppliers who can meet the standards that we expect. We are committed to utilising local suppliers and procuring goods and services from local businesses as much as practically possible. Over 99.895% by spend of our direct suppliers are located in Australia. Based on our current processes, we believe our exposure to Modern Slavery Risk is likely to be low.

Our website (<https://www.abbotpointoperations.com.au/>) provides more detailed information about our business, including our strategy, philosophy, and operations, as well as our approach to sustainability.

4 Modern Slavery Risks in Operations and Supply Chains

APO Group has considered whether APO Group may cause, contribute or be directly linked to modern slavery practices. We considered the industry, geographical locations and the types of products and services APO Group procures. As outlined above, our direct supply chain is narrow and is limited to goods and services procured for the administration and operation of the Terminal. A supplier may source a product such as parts, machinery or technology products from overseas and these overseas sources may be linked to modern slavery practices.

APO Group will continue over the next reporting period to engage with its suppliers to further understand the risks of modern slavery practices within APO Group's supply chain and where necessary take action to reduce those risks. APO Group is including terms and conditions in its template contracts to provide APO Group with due diligence rights to examine the procurement practices of counterparties in relation to their modern slavery obligations and take action where the counterparty is deficient and will strengthen its tender response schedules to include details on contractor's supply chain relating to modern slavery.

5 The APO Group's Actions

5.1 What are the APO Group's Actions?

Policies and Guidelines

The APO Group takes guidance from the Adani Group policies and code of conduct (the **Guidelines**). Adani Group policies require the entities and its people to conduct business in a manner that respects human rights, employees and contractors treat each other with dignity, respect, and consideration at all times and does not involve modern slavery practices. All procurements for the business are required to demonstrate that the spending of the company funds is justified, transparently procured, achieve the best value for money and be fit for purpose.

The Guidelines also prohibit discrimination, based on any protected attribute under the law. The Guidelines and the Employees and Contractors who are required to understand and adhere to the Guidelines, throughout their employment or engagement.

The objective of the Guidelines is to ensure that the procurement of all goods and services is conducted in an honest, competitive, full, fair, reasonable, transparent and ethical manner.

6 Effectiveness

To date, APO Group has not become aware of any occurrences where a supplier has engaged in practices in breach of their modern slavery obligations.

7 Consultations

APO Group consulted with the Directors in preparing this modern slavery statement and circulated a draft of this statement for review and comment, prior to it being put to the Board of Directors for final review and approval.

8 Looking Ahead

APO Group is continuing to develop and implement an improved framework to assess and monitor the Modern Slavery Risks in our operations and supply chain.

APO Group recognises that the risks of modern slavery are complex and evolving. We will continue to work to identify and address these risks in our business and engage with a range of stakeholders, to assess the effectiveness of our actions and enhance our approach.

This Modern Slavery Statement was approved by the Board of Directors on 23 August 2021, on behalf of itself and the other reporting entities covered by the statement.

On behalf of APO Group



Trista Brohier

CEO - Infrastructure