



Sea Swift Modern Slavery Statement
Under the Modern Slavery Act 2018 (cth)
Reporting Period: 1 July 2022 – 30 June 2023



Contents

1. **About this statement**

2. **Mandatory Criteria 1 and 2:**

The reporting entities, structure, operations and supply chains.

3. **Mandatory Criterion 3:**

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

4. **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.

5. **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

6. **Mandatory Criterion 6:**

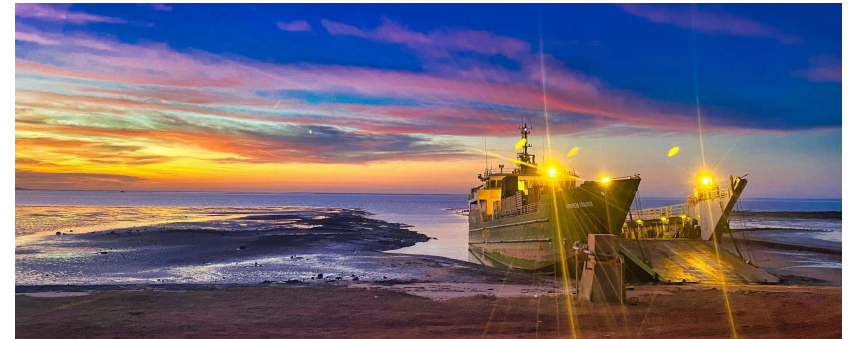
The process of consultation with entities owned or controlled by QGIF Taylor Holdco Pty Ltd Group and Approval of Statement by Principal Governing Body

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.

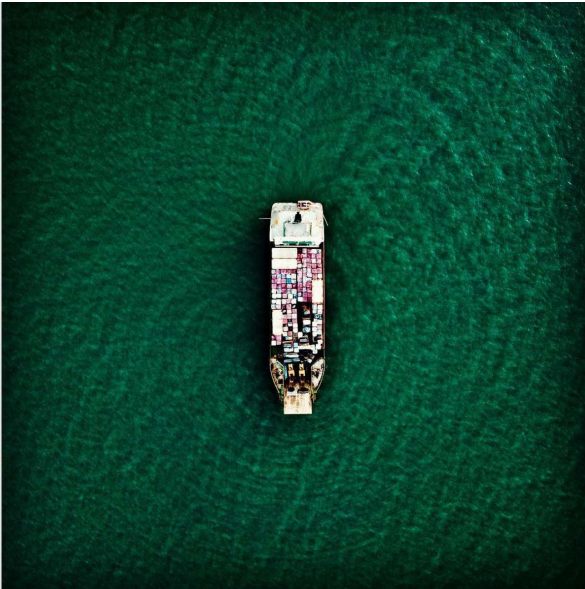


1. About this statement

This is the fourth 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 and human trafficking both within our business and in that of our supply chains.

Four Strategic Pillars underpin the Sea Swift strategy – People, Performance, Partnerships and Planet. Sea Swift will leverage these four pillars to address Modern Slavery risk by training its People, promoting Prosperity within the broader Sea Swift community and within the communities that Sea Swift serves, working in Partnership with its suppliers and promoting the sustainability of Sea Swift's supply chains (Planet).

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

- Modern Slavery training resources (Australia Border Force e-Learning Modules and internal Sea Swift quiz) have been rolled out to Sea Swift Executive, Management and key employees actively involved in Procurement.
- Published new Procurement Procedures and updated the Procurement Policy. These documents both address Modern Slavery.
- Provided training to staff across the business about their obligations under the Policy & Procedures with respect to Modern Slavery
- Ongoing assessment of our operations, and supply chains for exposure to Modern Slavery risk.
- Incorporating Modern Slavery requirements into our standard contracts.

2. Mandatory Criteria 1 and 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:

- Chief Executive Officer.
- Chief Financial Officer.
- Chief Operating Officer

The executive management team also includes the following senior executives.

- General Manager, QLD Operations.
- General Manager, NT Operations.
- General Manager, Assets & Infrastructure
- General Manager, Corporate Services
- General Manager, Safety, Risk & Sustainability

2. Mandatory Criteria 1 and 2:

The reporting entities, structure, operations and supply chains.

2.3 Our Operations

Sea Swift has a workforce of approximately 470 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 25 vessels servicing the area of operation. All our Sea Swift controlled vessels are crewed by Australian Citizens.

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

- Fuel Division transporting more than 60 million litres per annum to customers located throughout Northern Australia.
- Project Charter - Vessel chartering
- Engineering support
- Mother shipping support to the Northern Fishing Industry (Suspended in July 2023)
- Adventure Cruises (Qld) (inactive during the reporting period)



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



Adventure Cruise
In QLD



Mothershipping
Trawler fleet

2. Mandatory Criteria 1 and 2:

The reporting entities, structure, operations and supply chains.

2.4 Supply Chains

During the reporting period Sea Swift has a total of 682 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 between the third and fourth reporting period consist of:

- Fuel consumables; and
- Diversified Support Services

Fuel consumables remains Sea Swift highest dollar spend (see Figure 1.) as a result of bunkering the Sea Swift fleet, procuring fuel for delivery under contract and providoring 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 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 FY2023

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

Figure 2: Top 5 supplier industries by highest potential for modern slavery risk exposure in FY2023

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 FY2023

Australia
Indonesia
Singapore
United States

- All references and analysis in this section relates to suppliers paid during the financial year ending 30 June 2023.
- Figures 1 to 3 are based on data analysis tools provided by Fair Supply and is based on analysis of our 2023 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.
- Benchmarked 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. The shipping industry, particularly in Southeast Asia, is a known high-risk jurisdiction due 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 risks arising from its presence in the Southeast Asian shipping industry. We note that all Sea Swift employees are Australian residents. Sea Swift does not employ Indonesia crew members when our vessels are docked in Batam, Indonesia, rather utilises Australian based crew for these international voyages . For vessels operated by Sea Swift’s Australian entities, Sea Swift 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.

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

3.1 Operations

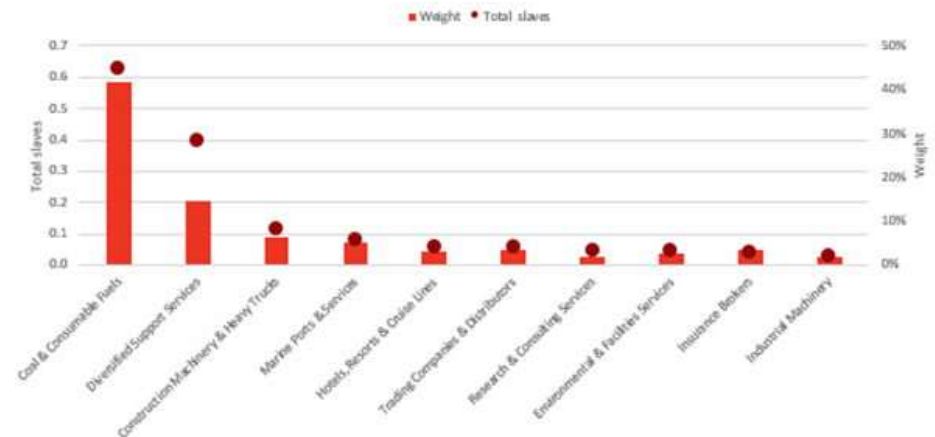
Sea Swift’s primary operations continue to involve, the provision of regular schedule cargo services to Northern Australia. Due to workforce composition, industry types, and award-compliant EBA in place, exposure to modern slavery practices remains most unlikely at a direct operational level.

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.

- **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.
- **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.

The below 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 01/07/2022 to 30/06/2023.



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

During the reporting period we undertook a comprehensive analysis of our direct suppliers, to provide us with deeper understanding of our modern slavery risk profile. The insights gained from this assessment will be used to tailor any future due diligence measures.

Our policies and Risk Management approach

During the reporting period, we continued the process of undertaking a gap analysis of our policy and procedure framework. We have made significant improvements to our Procurement framework and the practices and processes as they apply to Modern Slavery. During the reporting period, we have sought to address these issues through the following measures:

- Review of the Procurement Policy that requires employees to ensure that any procurement on behalf of Sea Swift is undertaken in accordance with Modern Slavery legislation. This policy was updated and approved by the Board during the reporting period.
 - 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 the tender evaluation plan and RFX 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 new 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 was sourced from the Australian Border Force website.

These changes will assist by building capacity to address Modern Slavery risk within the procurement and risk frameworks.

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

During the reporting period, the Sea Swift Group has established the following framework to allow us to continually monitor our modern slavery response.

Action Area	KPI for FY22 & FY23
Internal Risk Assessment	Continued audit and review of our current business policies and processes regarding recruitment and treatment of employees.
Supplier engagement	<p>Increased risk assessment of total procurement spend.</p> <p>Incorporating modern slavery risk mitigation measures into supplier onboarding process.</p> <p>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.</p>
Continuous improvement of internal governance frameworks	<p>Published 'Supplier Code of Conduct' that include Modern Slavery provisions.</p> <p>Published 'Purchase Order Terms and Conditions' that include Modern Slavery provisions.</p> <p>Modern slavery addressed in our Procurement framework.</p> <p>Continued inclusion of modern slavery provisions in supplier contracts and purchase order terms.</p> <p>Continued development of modern slavery focused tender process and supporting templates.</p> <p>Continued collaboration with key stakeholders</p>

Modern slavery related internal education and training	<p>Specific training provided to Executive, Management and key employees that are involved with procurement</p> <p>Awareness training provided to all staff members</p>
Grievance procedures and whistleblower facilities	<p>Update of existing Whistleblower policy to incorporate modern slavery provisions</p> <p>Regular analysis of level of uptake and use (or non-use) of grievance mechanism.</p>

Our next steps

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

- Finalising our gap analysis and development of the risk register
- Training 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 Action Plan to address any risks identified.
- Develop a Modern Slavery information page on the intranet (Procurement Hub) providing key information and links to supporting material (including further reading and training)
- Keep the Sea Swift Board apprised of any Modern Slavery risks and action taken.

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:


[Steve Boulton \(Nov 29, 2023 13:00 GMT+9.5\)](#)

Steve Ronald Boulton

Chairman

Date: Nov 29, 2023