



TT-Line Company Pty Ltd

Modern Slavery Statement

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**SPIRIT of
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CONTENTS

Introduction	4
About TT-Line	5
Structure, operations and supply chains	5
Modern slavery risks in operations and supply chains	8
Actions to assess and address modern slavery risks	11
Measuring the effectiveness of actions	13
Continuous improvement	13

MODERN SLAVERY STATEMENT 2023/2024 – TT-LINE COMPANY PTY LTD

Introduction

This Modern Slavery Statement is for TT-Line Company Pty Ltd (ABN 39 061 996 174) (**TT-Line**). TT-Line owns and operates the Spirit of Tasmania I and Spirit of Tasmania II vessels which provide daily passenger and freight transportation services between Devonport in Tasmania and Geelong in Victoria.

Modern Slavery is a severe form of exploitation of individuals for the purpose of personal or commercial gain and is prohibited under Article 4 of the UN Declaration of Human Rights. The *Modern Slavery Act 2018* (Cth) (the **Act**) identifies eight serious forms of modern slavery: trafficking in persons; slavery, servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services.

TT-Line fully supports the aims and objectives of the Act. TT-Line is committed to preventing modern slavery in its operations and supply chains.

In its fifth Modern Slavery Statement, TT-Line reports on its reasonable endeavours to meet its continuous improvement obligations to understand, identify and address the risk of modern slavery in its operations and supply chains. A summary of TT-Line's responses to each of the mandatory criteria in the Act is included in Appendix A of this statement.

TT-Line is always looking at ways to improve its response to modern slavery and this fifth statement continues to build upon the information provided in its fourth statement for the 2022-2023 financial year.

This Modern Slavery Statement has been prepared in consultation with the TT-Line Leadership Team and has been approved by the Board of Directors of TT-Line.



Damian Bugg
Interim Chair



About TT-Line

Company vision

TT-Line's vision is to deliver an unparalleled and unique sea transport service across Bass Strait.

Company mission

TT-Line's mission is to provide a commercially sustainable ferry service built on a reputation for excellence in safety, reliability and exceptional passenger and freight services.

Business objectives

TT-Line manages and facilitates the operation of a shipping service to and from Tasmania in a manner that is consistent with sound commercial practice.

TT-Line endeavours to do this through the provision of passenger and freight services on the Devonport to Geelong Bass Strait route and through the operation of the Edgewater Hotel in Devonport.

Approach to modern slavery

TT-Line prides itself on ensuring a safe environment for its passengers, employees, and contractors.

TT-Line ensures compliance with applicable legislative obligations including, but not limited to, those relating to governance, work health and safety, environment, and industrial relations obligations.

In drafting this Statement, TT-Line has taken into account the intention of the Act and the mandatory criteria for Modern Slavery Statements. To that end, TT-Line is taking a proactive approach where it considers appropriate to meet the expectations of the legislation to identify, address and prevent modern slavery risks across its operations and supply chains.

Structure, operations, and supply chains

Structure

TT-Line is a State-owned corporation formed under the *TT-Line Arrangements Act 1993* (Tas) (the **TTLA Act**) and is registered in Devonport, Tasmania.

TT-Line is a reporting entity under the Act as its annual consolidated revenue exceeded \$100 million in the 2023/2024 reporting period. TT-Line is a financial year reporting entity in accordance with the *Income Tax Assessment Act 1997* (Cth).

At the end of this reporting period, TT-Line has two Shareholder Ministers – the Honourable Michael Ferguson MP as Treasurer and the Honourable Eric Abetz MP as Minister for Transport being the Shareholder Ministers required under the TTLA Act. For the majority of the reporting period until April 2024 post the State election, only the Honourable Michael Ferguson MP was the Shareholder Minister. The Directors of TT-Line are appointed by the Shareholder Ministers.

During this reporting period, TT-Line owned and operated the Spirit of Tasmania I and Spirit of Tasmania II vessels and the Edgewater Hotel in Devonport.

During the reporting period, TT-Line owned several business names including Spirit of Tasmania, Edgewater Hotel and Edgewater Motor Inn. TT-Line does not own or control any other entities. Accordingly, TT-Line is the only entity covered by this statement. TT-Line listed the Edgewater Hotel for sale during the reporting period.

TT-Line operates its business in Tasmania and Victoria and has offices in Devonport, Geelong, and Melbourne. TT-Line has approximately 502 employees.

During the reporting period, TT-Line's internal organisational structure was made up of:

- The Leadership Team comprising:
 - the Chief Executive Officer (CEO);
 - the Chief Financial Officer (CFO);
 - the Chief Operations Officer (COO);
 - the GM Freight Services (GMFS);
 - the GM Human Resources (GMHR);

- the Chief Information Officer (CIO);
 - the GM Marine Operations (GMMO);
 - the GM Marketing (GMM);
 - the GM Passenger Sales (GMPS);
 - the GM Port Operations (GMPO);
 - the GM Retail and Hospitality (GMRH); and
 - the General Counsel/Company Secretary (GC/CS).
- with
- The CFO, COO and GC/CS reporting to the CEO; and
 - The GMFS, GMHR, CIO, GMMO, GMPO, GMM, GMRH and GMPS reporting to the COO;
- Finance and Commercial Team (reporting to the CFO);
 - Freight Services team (reporting to the GMFS);
 - Human Resources Team (reporting to the GMHR);
 - Information Services Team (reporting to the CIO);
 - Marine Operations Team (reporting to the GMMO);
 - Marketing Team (reporting to the GMM);
 - Passenger Sales Team (reporting to the GMPS);
 - Port Operations Team (reporting to the GMPO); and
 - Retail and Hospitality Team (reporting to the GMRH).

TT-Line's GC/CS monitors compliance with TT-Line's Modern Slavery Policy and relevant audit procedures, and their effectiveness on modern slavery prevention, on an annual basis.

Operations

The principal activities of TT-Line are providing commercial passenger, vehicle and freight shipping services between Tasmania and mainland Australia.

The core business of TT-Line is to:

- provide passenger and passenger vehicle ferry services across Bass Strait; and
- provide a freight shipping service across Bass Strait.

TT-Line's main operations as part of this business include:

- food and beverage;
- retail; and
- accommodation (both on board the Spirit of Tasmania vessels and in the Edgewater Hotel).

Supply chains

TT-Line supply chains involve various suppliers and contractors, primarily from within Australia.

TT-Line procures and outsources:

- goods (including, but not limited to, fuel, food and beverages, plant and equipment, lifesaving equipment, accommodation supplies, office supplies, uniforms, and tourism souvenirs); and
- services (including, but not limited to, services in relation to security, stevedoring, freight, media, marketing, tourism, sponsorship, IT, maintenance, cleaning, hospitality),

from within and outside Australia.

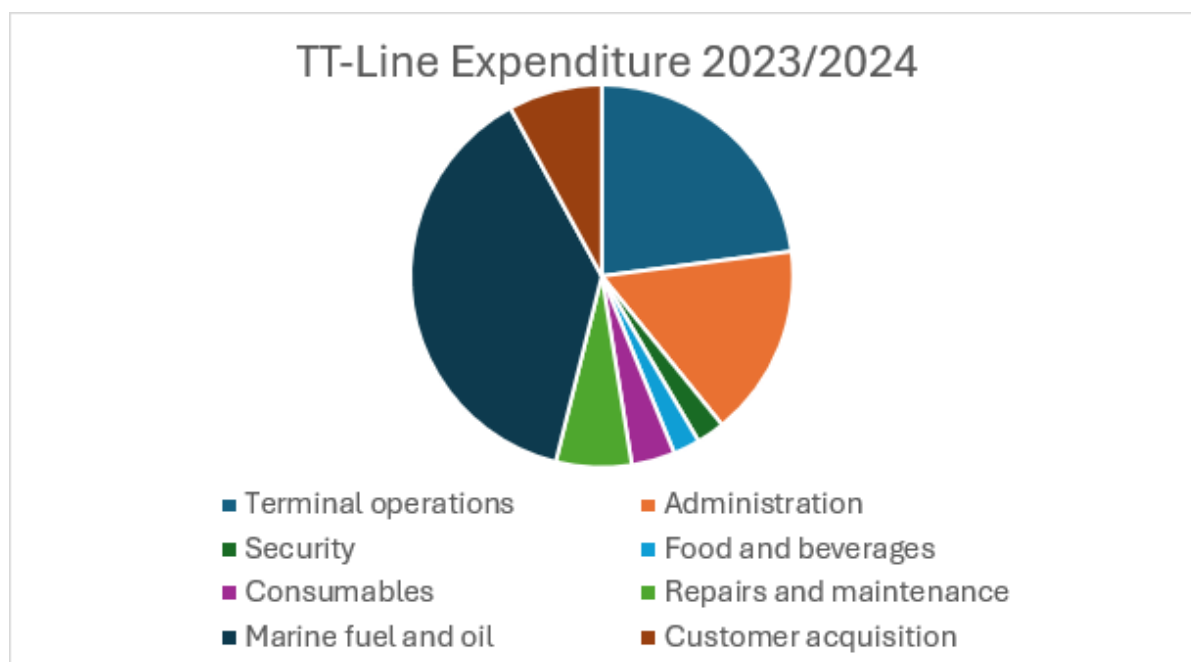
TT-Line enters into agreements and contracts (both short and long term) with suppliers and contractors across a variety of sectors (including, accommodation, retail and hospitality, travel, transport, marketing, media, and infrastructure and maintenance).

TT-Line's suppliers and contractors in turn can engage third party suppliers and subcontractors to assist in providing goods and services to TT-Line.

Procurement breakdown in 2023/2024

During 2023/2024, TT-Line's most significant expenditure was marine fuel and oil, followed by terminal operations, administration, customer acquisition (marketing), repairs and maintenance, consumables, security and food and beverages.

An outline of the breakdown of this expenditure is set out below.



Procurement methods

TT-Line's Procurement Policy establishes internal requirements for the acquisition of goods, services, or capital items and, wherever possible, supporting Tasmanian business.

Procurement is undertaken in a way that is consistent with the general principles of value for money, open and effective competition, ethical conduct in purchasing as well as enhancing opportunities for Tasmanian businesses in accordance with the Buy Local Guidelines for Tasmanian Government Businesses.

In 2023/2024, 28% of TT-Line's purchases were from Tasmanian businesses, up 9% on the previous reporting periods results. The dollar value for purchases from Tasmanian companies totalled \$98 million. TT-Line ensures that its operations, management, and staff are based within Tasmania to the maximum extent possible where consistent with the effective operation of the business, due to the nature of the maritime industry however, not all supplies (including fuel and spares for the vessels) are available for purchase in Tasmania.

All TT-Line's purchasing is undertaken in a fair and unbiased way in accordance with applicable legislation and TT-Line's internal policies. This includes:

- TT-Line buyers being fully accountable for the purchasing practices used and the decisions made;
- adhering to TT-Line's Code of Conduct and Ethics Policy;
- adhering to TT-Line's Modern Slavery Policy;
- identifying, dealing with, and documenting issues relating to actual or perceived conflicts of interest; and
- maintaining confidentiality.

Governance and policy framework

In addition to TT-Line's Procurement Policy, TT-Line's corporate governance framework includes policies and procedures that are relevant to modern slavery. In particular, the Modern Slavery Policy aims to minimise modern slavery risks and provide information and guidance to TT-Line employees, consultants, and contractors on how to recognise and deal with modern slavery issues.

These policies and procedures include:

- Modern Slavery Policy;
- Public Interest Disclosure Policy and Procedure;
- Whistleblowing Policy;
- Appropriate Workplace Behaviour Policy;
- Code of Conduct and Ethics Policy;
- Grievance Policy; and
- Privacy Policy.

These documents should be referred to in conjunction with this statement and are available on TT-Line's intranet for access by all staff.

All policies listed above apply to TT-Line's employees, contractors, consultants and external service providers and any other person who conducts work in any capacity for TT-Line. These policies outline the standards of personal and corporate conduct that TT-Line expects of all people working with TT-Line.

TT-Line ensures that compliance with these policies is a requirement under all TT-Line employment contracts and part of the induction process as relevant for new employees and contractors. TT-Line also endeavours to make compliance with these TT-Line policies a condition of all supply contracts.

Modern slavery risks in operations and supply chains

Scope of review

During 2023/2024, TT-Line conducted assessments into the modern slavery risks across relevant industry sectors where it was considered appropriate. As an Australian company with several policies and procedures in place to address modern slavery and related issues, TT-Line considers the risk of modern slavery in its direct operations to be very low. However, as previously noted TT-Line acknowledges that it may be exposed to modern slavery risks through its supply chains.

In this reporting period, based on the assessment of the risk of modern slavery contraventions by its suppliers, TT-Line continued to distribute its modern slavery questionnaires and Modern Slavery Policy to new suppliers where considered appropriate to gain further insight into its supply chains.

TT-Line received completed questionnaires from 11 additional suppliers during the 2023/2024 financial year and has analysed these responses to determine any necessary actions to address modern slavery risks. This makes a total of 46 questionnaires received over the past two reporting periods reflecting an increase in compliance monitoring of its supply chain by TT-Line. Some existing suppliers were also required to provide responses to the questionnaires pursuant to their existing contracts of supply. The conclusion of the assessment was that all of these suppliers are considered very low risk.

During the current reporting period, TT-Line has also reviewed the Modern Slavery Statements of each of its key suppliers that have published statements. While TT-Line's due diligence has not identified any known instances of modern slavery, TT-Line acknowledges that managing modern slavery risks requires ongoing commitment.

As with previous Statements, when conducting risk assessments into its operations and supply chains, TT-Line referenced tools such as the latest versions of the *Global Slavery Index*¹, as well as the due diligence and remediation recommendations in the *United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles)*².

Also consistent with our previous Statements, TT-Line's focus in this reporting period has again been to endeavour to conduct further assessment of the nature, context, and extent of modern slavery risks in its operations and supply chains where appropriate. Accordingly, in preparing this Modern Slavery Statement for the 2023/2024 reporting period, TT-Line has again sought to conduct risk assessments for sectors identified as higher risk and where possible has sought to demonstrate a continuous improvement approach by also assessing other sectors where such an approach was considered

¹ Global Slavery Index 2023

² United Nations Guiding Principles on Business and Human Rights 2011

appropriate in the circumstances. The reasoning behind this approach was to further build upon the company's approach in its first Statement, which primarily focused on those sectors considered higher risk.

In assessing the risk level of different suppliers and contractors, TT-Line considered such factors highlighted in guidance documentation from the Australian Government³ as:

- the type of industry and sector the goods and services are procured from;
- the countries the goods and services from the sector are sourced from;
- the sectors in which there is not clear visibility over sub-contracting arrangements; and
- goods and services that are deemed to be higher risk.

To avoid unnecessary repetition, this statement does not restate the modern slavery risks identified in detail in TT-Line's previous Statements. However, the Statement does address any historical potential issues previously identified and how these have been managed through TT-Line's normal due diligence processes.

As noted in the previous Statements the level of procurement across a number of areas and teams has increased during 2023/2024 reporting period primarily related to improved procurement processes, the completed first stage Vessel Replacement Program with the delivery of Spirit of Tasmania IV and the development of Berth 3 at the Port of Devonport and in light of these projects, it is important that the focus of TT-Line on modern slavery compliance with new suppliers is maintained.

Cleaning

TT-Line has taken reasonable measures to ensure that its cleaning services are not impacted by modern slavery and as reported. From the perspective of laundry services, TT-Line has considered the modern slavery risks from its laundry provider, a Tasmanian based company with Australian based suppliers and subcontractors. TT-Line considers that this provider continues to present a low risk of modern slavery. No reports or concerns raised regarding modern slavery in their operations regarding this company were received during the reporting period.

TT-Line vessels are cleaned by employees engaged through a national cleaning company. Consistent with TT-Line's Modern Slavery Policy this service provider was again required to complete the Modern Slavery Questionnaire regarding their practices during the 2023/24 financial year. No reports or concerns raised regarding modern slavery in their operations regarding this company were identified in the questionnaire or otherwise received during the reporting period. The service provider is required to publish its own Modern Slavery Statement and reports on its own compliance with the Modern Slavery Act (2018) approved by its Board annually. In its 2022 calendar year statement the Board confirmed the company's commitment to address global modern slavery issues. This reporting period will be its fourth statement.

Waste Management

TT-Line continues to engage a sole waste management provider. This provider is a national company and is a reporting entity under the Act. TT-Line has not received any reports of or had any concerns raised regarding modern slavery in any of its operations or supply chains. Over 99% of this provider's active suppliers continue to operate from Australia or New Zealand.

On that basis, TT-Line continues to hold the reasonable belief that modern slavery is not present in its cleaning or waste management operations or supply chains.

Construction and maintenance

While TT-Line's primary facilities maintenance supplier is not a reporting entity under the Act, it has developed a statement to recognise the responsibility for all employers to have an understanding and prevent slavery and human trafficking which it has promoted internally. The company is Tasmanian owned and operated and uses a very limited supply chain in providing its services to TT-Line.

Vessel Replacement

In the 2021/2022 reporting period, TT-Line commenced construction of two new ships to replace the current Spirit of Tasmania vessels. The shipbuilder is a Finnish company which adheres to international norms and agreements on human rights, employment rights, the environment, and anti-corruption

³ Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities May 2023.

including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights.

TT-Line is continuing to negotiate for up to \$100 million worth of local (Tasmanian/Australian) content to be included in the build. To facilitate the procurement of local materials and content and to manage the procurement, TT-Line employed a Tasmanian based Procurement Manager, who is the representative of the shipyard in Finland in relation to both the procurement of local materials and content, timing, quality, and logistics of the delivery of these materials. While TT-Line does not have direct visibility of the company's supply chain, the Procurement Manager continues to assist in assessing and addressing any identified modern slavery risks.

As previously reported, procurement for the vessel replacement project is a combination of services provided and goods sourced by the shipbuilder and goods sourced by TT-Line for inclusion in the manufacture. Based on the human rights framework under which the shipbuilder must operate in the EU and TT-Line's own procurement strategies and obligations under the Act, TT-Line is of the view the risk of modern slavery contraventions by the company is very low. RMC also have a strict core ethical rules and principles policy that applies to all employees and contractors and requires each contractor to sign a declaration that it will comply with all local rules and laws and follow internationally acceptable ethical standards in the procurement of goods and services. Given the strict human rights obligations that the company is required to comply with and having previously completed a questionnaire during the 2022/2023 reporting period, RMC were not required to complete a questionnaire during this reporting period. Due to the continuing nature of the project, a questionnaire will be required to be completed during the 2024/2025 reporting period

Geelong Port

TT-Line's passenger and freight terminal at Corio Quay, Geelong, leased from GeelongPort Pty Ltd, (GeelongPort) opened during the 2022/2023 reporting period. Work continued at the terminal during the defects' liability period into this current reporting period. As previously reported, GeelongPort engaged contractors to build the new terminal and they continue to manage any detected defects during this reporting period. During that time, the entity was covered by LINX Cargo Care Group's (**LINX CCG**) Modern Slavery Statement, as one of five entities it owns and continues to assess there to be a low risk of modern slavery amongst its employee population. LINX CCG continue to publish their own Modern Slavery Statement and TT-Line's landlord and Principal under the construction contract, GeelongPort Pty Ltd, have in place their own zero tolerance Modern Slavery Policy.

Food and beverage products

TT-Line continues to engage with the same seafood and food product suppliers as in the previous reporting periods.

Accordingly, TT-Line continues to monitor one of its major international food suppliers to audit its progress in remediating modern slavery issues in its supply chains. TT-Line regularly engages with this supplier to ensure it is maintaining its approach to addressing modern slavery challenges. The supplier publishes its own Australian Modern Slavery Statement annually. The supplier also includes a "*Respecting and Promoting Human Rights*" section in its annual Sustainability Report which it publishes on its company web site and have recently released its Human Rights Roadmap and Framework. On that basis, TT-Line is of the informed view that the risk of modern slavery practices at the company is very low.

A Tasmanian supplier with relevant policies including a Human Rights Statement, Anti Bribery Corruption and Fraud Policy, and Whistleblower Policy is another major supplier for TT-Line. During the reporting period it was confirmed that the supplier is still a member of Sedex, a membership organisation that provides a platform for companies to manage and improve working conditions in global supply chains.

The supplier is externally audited through the Sedex SMETA (**Sedex Members Ethical Trade Audit**) program. All the supplier's subcontractors operate in Australia, and it has undertaken a supply chain risk assessment for forced/bonded/trafficked labour and the subcontractors have been independently audited and approved by either SMETA or BSCI (**Business Social Compliance Initiative**). The supplier confirmed during the reporting period to the best of its knowledge that its risk of modern slavery is very low and remains committed to helping its supply chain to mitigate any risks. To assist TT-Line with its monitoring of its supply chain, the supplier also required its contractors to respond to the TT-

Line Modern Slavery Questionnaire and no instances of human rights impacts within the reporting period were identified in the questionnaires. Based on those responses and the response from the supplier, TT-Line is of the informed view that the risk of modern slavery practices at the company and its suppliers remains very low.

TT-Line's major beverage supplier, a Tasmanian based company, is not required to comply with the obligations under the Modern Slavery Act. The company confirmed again during the 2023/24 reporting period that it is not aware of any modern slavery in its operations or supply chains and, while TT-Line acknowledges that the use of unskilled, temporary, or seasonal workers is a potential indicator of modern slavery risk⁴, TT-Line is of the informed view that the risk of modern slavery practices at the company is very low.

Souvenirs and tourism items

TT-Line continues to monitor its relationship with its supplier of souvenirs and tourism items sourced from an Australian company with suppliers throughout China, Hong Kong, India, and Taiwan. The company continues to review its relationships with product suppliers, and it receives regular audit reports on the ethical standards and conditions for workers and exclusion of slavery and child labour. In their response to the questionnaire, TT-Line's direct supplier is not aware of any modern slavery occurrences in this supply chain. TT-Line will continue to work with this supplier to assess and prevent the risk of modern slavery in its supply chains where appropriate.

Fuel and oil

TT-Line's supplier of fuel to the vessels in Geelong is a reporting entity and has published its own Modern Slavery Statement current for the 2022-23 reporting period. The supplier's risk assessment into modern slavery during that period found that 33 out of 101 of the company's key suppliers who responded to their Modern Slavery Questionnaire raised flags for follow up on their potential modern slavery risk. The company completed a detailed review to better understand the modern slavery risks posed by those 33 suppliers and concluded that none of the suppliers were considered to be a Modern Slavery risk.

The supplier's approach to modern slavery is set out in its Business Principles and Code of Conduct document and it is still committed to publishing its approach to modern slavery performance against key indicators in its Annual Reports. In responding to TT-Line's Modern Slavery Questionnaire the company confirmed its commitment through its Modern Slavery Statement and Human Rights Policy.

TT-Line continues to engage a Victorian diesel fuel injection service, repair, and parts solution provider. The provider remains ISO certified and has control measures to address modern slavery risks and is not aware of any instance of modern slavery in its operations or supply chain. Compliance with modern slavery policies and procedures in that company is monitored by an ISO Manager and senior management participates in enforcing modern slavery policies and procedures. The provider has a Modern Slavery Policy, and any breach of the policy would lead to disciplinary action in accordance with the company's Disciplinary Procedure.

Security

TT-Line continues to engage the same security services provided as discussed in all previous Modern Slavery Statements. As noted, the security services provider is not a reporting entity under the Act but has a Human Rights Policy addressing modern slavery. The provider's Human Rights Policy addresses the actions it takes to address human rights issues including both internal and external reporting processes for employees, contractors, and/or members of the public to report any circumstances or action that violates or appears to violate its Human Rights Policy.

Actions to assess and address modern slavery risks.

TT-Line has sought to take meaningful steps to identify and respond to modern slavery risks in its operations and supply chains.

In this Modern Slavery Statement, TT-Line has continued to build on the improvement during the previous three years wherever possible.

⁴ Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities, page 80.

TT-Line primarily addresses the risks of modern slavery practices occurring in its operations and supply chains through strict procurement and operational procedures. To ensure TT-Line is aware of and manages modern slavery risks, TT-Line has:

- issued a due diligence questionnaire to key suppliers and contractors and reviewed and evaluated the responses it has received to date and will continue to undertake this process for any newly engaged suppliers as procurement increases with new projects where appropriate based on a modern slavery risk assessment of the supplier;
- where a supplier is contracted for a term greater than 12 months, they are required to complete a questionnaire at least bi-annually or when otherwise requested by TT-Line to ensure continual monitoring for compliance with TT-Line's modern slavery framework;
- conducted further due diligence on key suppliers and contractors by examining Modern Slavery Statements and policies of those suppliers and contractors where appropriate;
- ensured that modern slavery is addressed as part of all tender processes irrespective of the size of the tender;
- built upon the work undertaken in the previous reporting period to conduct risk assessments of higher risk sectors and to also assess sectors not considered to be higher risk;
- worked to ensure that staff are aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms, with a particular focus on educating the procurement team;
- included its modern slavery clause in all supplier contracts as noted above. The clause requires suppliers to:
 - comply with all applicable modern slavery laws and TT-Line's Modern Slavery Policy and agree that non-compliance is a basis for contract termination;
 - insert modern slavery clauses into contracts with their suppliers and subcontractors;
 - report to TT-Line as soon as they become aware of any breach, or potential breach, or any actual or suspected modern slavery in a supply chain which has a connection with a TT-Line contract;
 - provide a report to TT-Line each year if requested by TT-Line taking a risk-based approach setting out the steps it has taken to ensure that modern slavery is not taking place in any of its supply chains or any part of its business;
- used its best endeavours to make stakeholders aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms;
- continued ongoing engagement with contractors and suppliers to better understand potential risks of modern slavery in operations and supply chains; and
- worked with direct suppliers to improve their awareness of modern slavery risks and how they may contribute to modern slavery.

Grievances and Remediation Processes

TT-Line has policies in place to provide employees and contractors with avenues to report any concerns regarding conduct.

These include the:

- Grievance Policy;
- Whistleblowing Policy;
- Public Interest Disclosure Policy;
- Code of Conduct and Ethics Policy; and
- Appropriate Workplace Behaviour Policy.

These policies also apply to modern slavery. Specifically, the Modern Slavery Policy provides that TT-Line will assess and investigate any disclosure in relation to modern slavery as it deems appropriate:

- in accordance with its current policies;
- by seeking third party support; and
- by reporting any suspected situations of modern slavery to the Australian Federal Police.

If a breach of the Modern Slavery Policy is identified, TT-Line may take other action as appropriate for the breach such as:

- assisting with remediation where harm or non-compliance is identified;
- issuing formal apologies;
- stopping certain activities or terminating a contract; or
- taking disciplinary action in accordance with its disciplinary procedures.

Measuring the effectiveness of actions

TT-Line acknowledges that it is essential to ensure its actions to assess and address modern slavery risks are effective.

As part of its continuous improvement approach to addressing modern slavery, TT-Line incorporates the following actions during the reporting period to improve how it monitors the effectiveness of actions to address modern slavery:

- Reviewing all TT-Line contracts entered into during the reporting period by the GC/CS for the inclusion of a modern slavery clause prior to contract execution ;
- Investigating potential key performance indicators (**KPIs**) to better measure the effectiveness of education/training programs, the use of the modern slavery contract clause and the number of questionnaire responses received;
- Looking at improving existing frameworks and processes to review the effectiveness of actions, including developing a Monitoring and Evaluation Framework during the next reporting period.

The GC/CS, is responsible for the management of the Modern Slavery Policy, monitors the policy and audit procedures where appropriate and their effectiveness on an annual basis. The continuing responses is evidence that the continuing compliance steps are supporting the process.

Continuous improvement

In addition to the actions addressed above, TT-Line is committed to continuous improvement in future reporting periods. TT-Line has continued to progress its work to embed human rights due diligence into its risk and procurement frameworks and to ensure awareness of modern slavery risks throughout the organisation.

In 2021/2022 TT-Line adopted the following three-year plan beginning during the 2022/2023 period:

- 2022/2023 reporting period:
 - TT-Line developed a training and education program for TT-Line staff presented to and approved by the Leadership Team in relation to modern slavery especially around procurement to address the projected increases in procurement in relation to the vessel replacement and berth 3 projects in the 2023/2024 reporting periods;
 - The Company also improved the governance and compliance processes illustrated by the markedly improved responses to the Company's Modern Slavery Questionnaires required under existing and new contractual arrangements.
- 2023/2024 reporting period:
 - The company rolled out an on-line TT-Line Training and Education program to managers and general staff and will also be incorporated into the annual induction training
 - Regular communication and compliance assessment with service and goods suppliers ensures ongoing compliance with the Act.
 - Improved governance processes and procedures to assess to compliance with modern slavery guidelines by existing and new service and goods suppliers have been initiated during the reporting period. For example, the requirement to include a Modern Slavery Questionnaire with all agreements is recorded through the Company's Contract Lifecycle Management Platform through specific questions to be answered during the uploading and review process. Alerts are created to ensure contract owners are reminded that suppliers are required to complete an MS questionnaire according to an agreed schedule. All completed MS Questionnaires are uploaded with the agreements as internal documents for recording purposes. Compliance with this obligation can be audited through the platform.
- 2024/2025 reporting period:

- The Training and Education Program will be further enhanced and expanded to ensure compliance across the Company.
- Develop KPIs for measuring effectiveness of action based on lessons learned with the improvement of the governance processes and procedures.
- Develop a process/flowchart to identify where the company will seek profession/legal advice relating to modern slavery risks that become apparent during preceding reporting periods.

Future Statements will continue to address and report on performance against the three-year plan.

Appendix A: Addressing the mandatory reporting criteria.

Mandatory criteria	Page number/s
Identify the reporting entity.	5
Describe the reporting entity's structure, operations, and supply chains.	5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11
Describe how the reporting entity assesses the effectiveness of these actions.	13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	TT-Line does not own or control any other entities.