

Modern Slavery Statement

In accordance with the Modern Slavery Act 2018 (Cth)

On behalf of:

Abbot Point Operations Pty Ltd

ACN: 605 852 060

ABN: 58 605 852 060

and

Abbot Point Bulkcoal Pty Ltd

ACN: 010 183 534

ABN: 23 010 183 534

Reporting period – 1 April 2024 – 31 March 2025



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1 Introduction

This Modern slavery Statement is made in accordance with section 14 of the Australian *Modern Slavery Act 2018 (Cth)*(MSA).

It describes steps taken by the APO Group during the year ended 31 March 2025, to mitigate the risk of modern slavery in the Group's operations and supply chains.

This Modern Slavery Statement is a joint statement, made on behalf of 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). A reporting entity under the MSA is based on operating in Australia with revenue exceeding \$100 million in the reporting period. 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.

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

This statement was approved by the boards of each of the two reporting entities covered by this statement.

2 Modern Slavery Law

The Act identifies seven relevant mandatory criteria which APO Group's 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and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (under draft guidance, 'operations' includes 'investments').
- d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess an 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.
- g) any other information the reporting entity considers relevant.

3 Mandatory Criteria One: Identify the reporting entity

This is the joint modern slavery statement for the APO Group which comprises of the following two Australian registered companies:

1. Abbot Point Operations Pty Ltd (APO)

ACN: 605 852 060 / ABN: 58 605 852 060

APO is an Australian Proprietary Company, registered in Queensland in 2015.

Registered Office: Adani Renewable Asset Holdings Pty Ltd, Level 9, 120 Edward Street Brisbane QLD 4000.

Principal Place of Business: Abbot Point Road, Bowen.

Ultimate holding Company is Adani Ports and Special Economic Zone Ltd.

100% shares of APO are being held by Adani Ports and Special Economic Zone Ltd.

And

2. Abbot Point Bulkcoal Pty Ltd (APB)

ACN: 010 183 534 / ABN 23 010 183 534

APB is an Australian Proprietary Company, registered in Queensland 1980.

Registered Office: Adani Renewable Asset Holdings Pty Ltd, Level 9, 120 Edward Street Brisbane QLD 4000.

Principal Place of Business: Abbot Point Road, Bowen.

Ultimate holding Company is Adani Ports and Special Economic Zone Ltd.

100% shares of APB are being held by Abbot Point Operations Pty Ltd.

APO and APB (together APO Group) are reporting entities under the Modern Slavery Act 2018 (Cth) (the Act). This is the joint statement for the APO Group.

4 Mandatory Criteria Two: Describe its structure, operations and supply chains

4.1 Structure

APO is an Australian Proprietary Company that was established in 2015 and is based in Brisbane, 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. APO owns and controls APB.

APB is an Australian Proprietary Company that was established in 1980 and is based in Bowen, Queensland. Adani Ports and Special Economic Zone Limited is the ultimate holding company of APB. APB is 100% owned and controlled by APO.

APB operates as Abbot Point Operations:



4.2 Operations

North Queensland Export Terminal (Terminal) is a dedicated deep-water coal export terminal with a nameplate capacity of 50 million tonnes per annum.

The terminal was constructed as a dedicated deep-water coal export terminal by the Queensland Government and commissioned in 1984. The Terminal is owned by the Queensland Government's North Queensland Bulk Ports and leased by North Queensland Export Terminal Pty Ltd (NQXT) under a 99-year leasehold which was acquired in June 2011. NQXT has contracted Abbot Point Operations to manage the operations of the terminal.

The terminal is located in the Port of Abbot Point, approximately 25 km north of Bowen, in North Queensland on Australia's east coast. The Port of Abbot Point includes Australia's northernmost resource terminal and is one of only three major resource ports located within 200 km of the Bowen Basin, which is one of Australia's major resource provinces.

The Terminal is a dedicated coal export terminal comprising a dual rail in-loading facility, coal handling and stockpiling areas comprising three bunds capable of being serviced by six stacker reclaimers and a 2.8-kilometre trestle jetty and conveyors connecting to two offshore berths and two ship-loaders.

APO has been contracted by NQXT to manage the operations at the terminal (Operations and Maintenance Contract). Pursuant to a sub-contract between APO and APB (Operations and Maintenance Subcontract), APB performs the operations and maintenance services at the terminal.

Whilst APO derives revenue through the sub-contract with APB, it does not perform any operational role nor engage any third-party contractors. This is exclusively provided by APB. Whilst this Statement is made as a joint Statement because of the combined revenue of both entities, all modern slavery risks and controls are contained within APB. The identification and management of modern slavery supply chain risk has, therefore, been focussed on the activities and supply chain of APB as APO does not perform any relevant activities nor have an independent supply chain from APB.

APO Group's operations include:

- Processing and delivery of product or services. The APO Group unloads coal from the dual rail in-loading facility and transports the coal to the three stockpiling bunds located at the Terminal. The coal is then collected by any one of the six stacker reclaimers and transported along a 2.8-kilometre trestle jetty and conveyor to one of the two offshore berths to one of the two ship-loaders and loaded onto awaiting coal vessels. The whole processing and delivery of product; the operations; which the APO Group is responsible for occurs at the Port of Abbot Point, Bowen, North Queensland, Australia.
- Direct employment of workers. During this reporting period, APO did not have any employees, while APB employed 214 employees based at the Terminal. Employees are employed under individual employment contracts or an enterprise agreement which has been approved through Fair Work Australia processes. Our employees fulfill the role of management, office support staff, production and maintenance personnel.
- Construction. The APO Group is responsible for the ongoing maintenance of the Terminal. This includes ongoing improvement works and replacement of assets as they near end of life. These works are primarily performed by our specialised contractors and managed by our direct employees.
- Charitable activities. The APO Group donates to the local community through its Community Support Programs. The Program includes ongoing sponsorship in the local community, donations, club sponsorships, events and community memberships.

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.

4.3 Supply Chains

Our supply chain consists of businesses that provides goods and services to the APO Group. To support our operations, we engage with specialised businesses to maintain the Terminal assets.

Our spend in this area is primarily with 99% with Australian entities and 1% from overseas entities (Germany, New Zealand, United Kingdom and USA).

Spend is categorised as follows:

- Fuel, energy, utilities and Lease – 17%
- Insurances – 16%
- IT services – 5%
- Contract Services – 32%
- Goods supply - 7%
- Goods & Services – 23%

5 Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

Whilst APO Group strives to ensure there is minimum risk of modern slavery in its Operations and Supply Chain, APO Group acknowledges that there is a potential for the APO Group to cause, contribute to, or be directly linked to modern slavery.

We acknowledge that within our operations there are areas of vulnerability which include outsourced services such as cleaning, security, maintenance and construction services, and the use of labour hire contractors.

This year, we identified areas where modern slavery risks are traditionally higher, due to lower entry to work requirements such as language, migrate workforce and working conditions. We performed investigations with suppliers which fell into these categories, such as cleaning, painting, scaffolding and boiler making. We found that in this instance, there was no known incident of modern slavery. We acknowledge there will continue to be a level of modern slavery risk as the workforce are primarily made up of low skill and language proficiency. APO Group continues to educate and enforce our Code of Business Conduct and site safety requirements such as adequate personal protection and fatigue working hours, by mandating training and continued engagement with the workforce.

Additionally, the risk of modern slavery may be heightened in some of our groups supply chains because of the geographical sourcing of materials used in products supplied to us. Materials such as rubber, steel and fabrics sourced from Southeast Asia carries high risk of modern slavery practices such as the use of slave labour and non-award payment of wages.

Our rubber belts are supplied through a single business, with operations in Australia. However, raw materials used to manufacture the conveyor belt compounds do come from overseas suppliers, with natural rubber being sourced from Malaysia and other major raw materials sourced from countries including Asia. Our supplier operates under a Duty of Care Plan whilst sourcing raw materials and have in place mitigation plans to address any identified risk. While these actions have been put in place by our first-tier suppliers, the risk of modern slavery is still present as there is a lack of visibility in their secondary levels of chain of suppliers and source materials which carries additional risk of modern slavery.

While APO Group has not directly caused any Modern Slavery risks, the risk of modern slavery will continue to remain in areas where materials and labour are sourced from third world nations within the APO Groups supply chain, these risks may not be apparent through our first-tier engagements but maybe hidden within their own supply chain. Risks in Modern Slavery also exists where the workforce is primarily of low skill base, language proficiency, low barriers to entry along with low rates of union membership.

6 Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation process

Over this reporting period, we have made implemented process and actions to assist in addressing our modern slavery risks associated with our operations and supply chains. This includes:

- Mandate Modern Slavery training requirements;
- Continued engagement with the workforce;
- Implemented new training requirements;
- Continue to screen new suppliers;
- Continue to engage with businesses considered high to medium risk;
- Conduct Modern Slavery meetings with the Modern Slavery Committee to review, evaluate, measure compliance and drive improvement within our Operations and Supply Chain;
- Updated Code of Business Conduct Standard and implemented the Right to Disconnect Standard;
- Continue to provide ongoing assistance and support for victims of modern slavery through our Employee Assistance Program (available to our staff and suppliers); and
- Publicly communicated our Modern Slavery Statement 2025 on our website.

7 Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

We will use key performance indicators (KPIs) to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chains have been. Over our last reporting period, we assessed the effectiveness of our actions across four key performance areas:

- Governance & due diligence;
 - Half yearly engagement with board members to track KPI performance
- Procurement & supply chain;
 - Percentage of contracts which include modern slavery clauses;
 - Percentage of new suppliers completing the modern slavery questionnaire;

- HR practices, training & education;
 - Completion rates of modern slavery training
- Grievances and reporting
 - Number of modern slavery cases identified and remediated

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

8 Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

9 Mandatory Criterion Seven: Any other relevant information

No further information included in this section.

10 Joint Reporting Entities Principle Governing Body Approval

This statement is signed by the boards of each of the two reporting entities covered by this Statement on 29 September 2025.

11 Reporting Entities Signature of a Responsible Member

On behalf of Abbot Point Operations Pty Ltd



Paul Fennelly

Director

29 September 2025