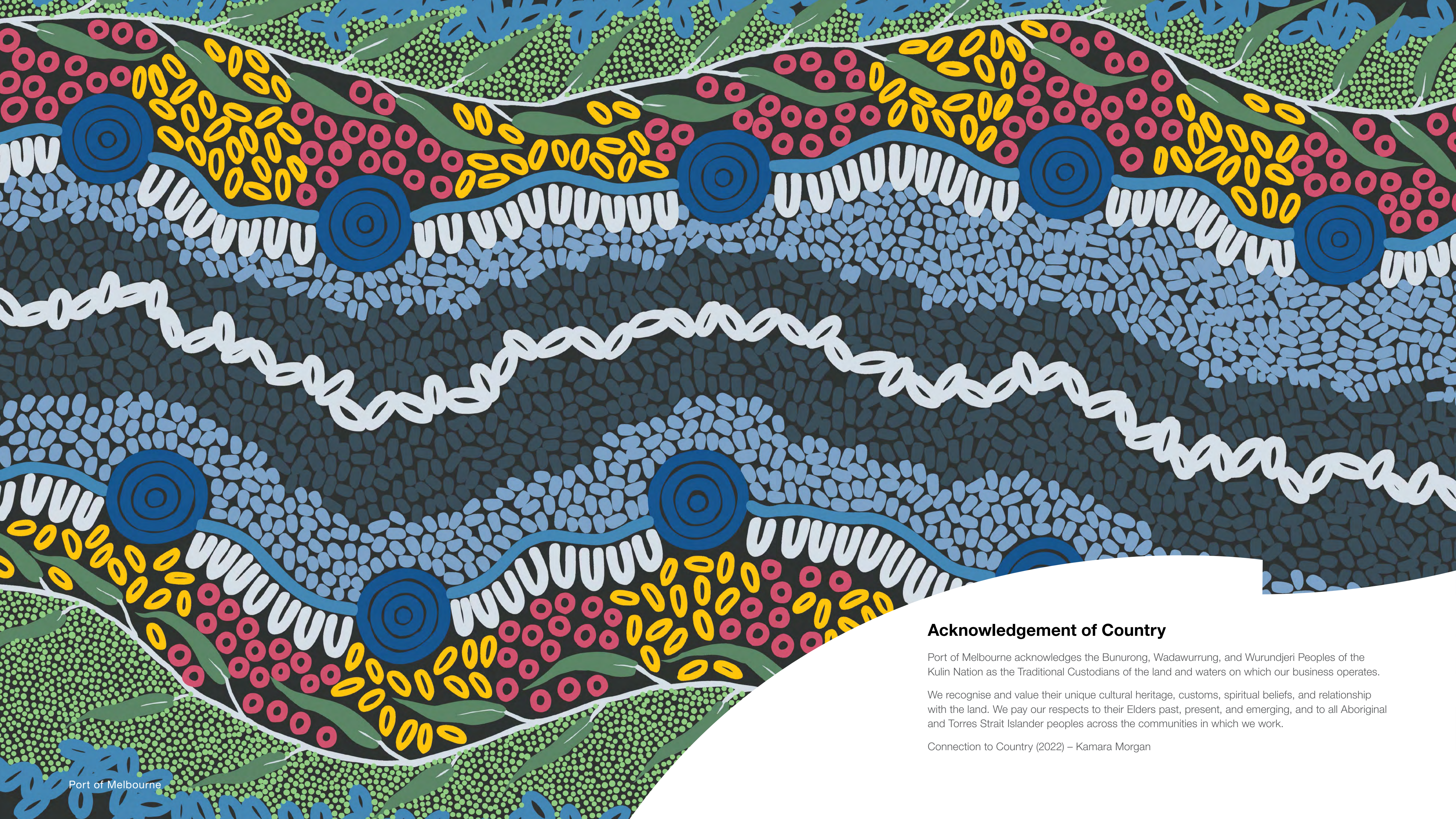




2024 Modern Slavery Statement

Port of Melbourne





Acknowledgement of Country

Port of Melbourne acknowledges the Bunurong, Wadawurrung, and Wurundjeri Peoples of the Kulin Nation as the Traditional Custodians of the land and waters on which our business operates.

We recognise and value their unique cultural heritage, customs, spiritual beliefs, and relationship with the land. We pay our respects to their Elders past, present, and emerging, and to all Aboriginal and Torres Strait Islander peoples across the communities in which we work.

Connection to Country (2022) – Kamara Morgan

About this statement

This Modern Slavery Statement (**the Statement**) is made on behalf of the entities detailed below which are a part of the Port of Melbourne Group (referred to as **PoM, we, our or us**), and has been prepared in accordance with, and for the purposes of the *Modern Slavery Act 2018* (Cth) (**the Act**).

This Statement describes the risks of modern slavery in our operations and supply chain during the year ending 30 June 2024 (the **Reporting Period**) and details the steps that we have continued to take to respond to these, along with an assessment of the efficacy of these steps.

The following entities within PoM are reporting entities under the Act as they carry on business in Australia and had a consolidated revenue of over \$100 million during the Reporting Period:

- Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust;
- Lonsdale Operations Hold Pty Limited as trustee for the Lonsdale Operations Hold Trust;
- Lonsdale Asset Hold Pty Limited as trustee for the Lonsdale Asset Hold Trust;
- Lonsdale Asset Property Pty Limited as trustee for the Lonsdale Asset Property Trust; and
- Lonsdale Finance Pty Limited.

For completeness, Lonsdale Finance Hold Pty Limited, also an entity within PoM, is included in this Statement which applies to all PoM entities (together, the **Port of Melbourne Group**).

Consultation and approval

Port of Melbourne Operations Pty Ltd, as trustee for the Port of Melbourne Unit Trust, is the operating entity of PoM and provides services to the entities within PoM under

management agreements. As a service provider, it is informed on all activities undertaken by PoM and employs all staff within PoM. In this Statement, a reference to the Board is to the board of the Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust.

This Statement has been prepared in consultation with, and has been approved by, the Board on behalf of each of the Reporting Entities comprising PoM on 27 November 2024 and is correct as of that date.

Disclaimer

This Statement has been prepared by Port of Melbourne Operations Pty Ltd as trustee of the Port of Melbourne Unit Trust on behalf of PoM for the purposes of the Act in relation to the Reporting Period (**Purpose**). This is a proprietary PoM document. While PoM has made reasonable efforts to ensure that information and materials provided in this Statement are free from error, PoM provides no warranty as to the accuracy, adequacy or completeness of any information provided. The information is based on information and sources which PoM believes to be reliable. Such information is intended as general information only and is intended to be current at the date of this Statement's publication. PoM recommends that any party seek further advice or make further enquiries which considers the relevant party's particular circumstances before considering or acting on this material further. PoM will not be liable to any third party using or relying on any information contained in this Statement for any purpose other than the Purpose.



Contents

Chairperson’s message	5
About Port of Melbourne	6
Our values	8
Our governance and policies	9
Policies, codes, and frameworks	10
Our workforce	11
Our supply chain	12
Modern slavery risks	13
Effectiveness of actions	15
Our forward focus	18
Appendix One: Priority risk areas	20
Appendix Two: Mandatory reporting criteria	21



Chairperson's message

Port of Melbourne has been a trade gateway for south-eastern Australia for more than 130 years. We are proud of our role as custodian of the port, which is a vital economic asset and a critical part of Victoria's infrastructure. Our ongoing success is essential to the continued growth and prosperity of Victoria and Australia.

Through our commitment to sustainability, we work with stakeholders across the supply chain with the goal to build a sustainable port for the benefit of the Victorian economy and liveability of Melbourne. Central to this is our commitment to operate our business responsibly and ethically, and we expect that our stakeholders and suppliers will operate in the same way.

In FY24, we formalised our commitment to upholding human rights by developing a Supplier Code of Conduct which outlined the principles and expectations that guides PoM's relationships with its suppliers. We engaged with our higher risk suppliers by requesting they complete self-assessment questionnaires. This provided PoM with a greater understanding of the policies, practices and processes that they have in place to mitigate the risk of modern slavery.

We provided training to our employees on building awareness of the modern slavery risks within PoM's supply chain and providing practical strategies to address those risks.

PoM proudly continued to provide financial support to our long-term community partners, Stella Maris and The Mission to Seafarers, whose objective is to support seafarer welfare.

Going forward, we are committed to continuing to strengthen our practices and engaging with our suppliers to address risks of modern slavery in our operations and supply chains.



John Stanhope
Chairperson of the Board of Directors



About Port of Melbourne

As Australia’s largest general cargo and container port, the port is a vital trading gateway for south-eastern Australia, including Tasmania, facilitating more than one-third of the nation’s container trade, and enabling economic activity in the region. The port occupies a central position in the freight and logistics industry.

As landlord, we are responsible for the strategic planning, development, and management of the port under a 50-year lease from the Victorian Government.

The Port of Melbourne Group is owned by several of the largest and most experienced global infrastructure investors with expertise in managing significant infrastructure assets, including QIC (on behalf of its managed funds and clients), Future Fund, Global Infrastructure Partners and OMERS Infrastructure.

Our operations

PoM manages 505 hectares of port land stretching from Williamstown in the west around Port Phillip Bay to Port Melbourne in the east. We also manage 52 kilometres of commercial shipping channels within Port Phillip Bay and the Yarra River.

Under the lease arrangement, PoM is responsible for maintaining and developing these land and waters, and the port facilities and associated infrastructure which includes 30 commercial berths and wharves, terminal and trade-handling facilities and connections to surrounding road and rail networks. Our responsibilities also include planning for the long-term use of port land and shipping channels to ensure we have the capacity and capability to meet the future demands of Victoria’s growing economy.

The berths, wharves, terminals, and trade handling facilities are used by our 71 tenants and other private businesses who largely undertake the port’s daily operations, including the provision of cargo shipping, stevedoring, pilotage, towage and road and rail transport services.

Our regulatory framework, overseen by the Essential Services Commission, enables PoM to charge tariffs for prescribed services including wharfage fees, berth hire fees and channel fees. We also charge tenants to lease space and facilities in the port precinct.



Port of Melbourne’s major trade links.

FY24 operational statistics



Our values

Our values are fundamental to everything we do, both within our own operations and through our engagement with our stakeholders. Our values guide how we go about our business, the decisions that we make, and the actions that we take every day.

Our vision, mission and values

OUR VISION

Our passion for growing trade creates an enduring city port, driving the economy and enriching lives.

OUR MISSION

Working with stakeholders, delivering innovative and sustainable port solutions - creating the future and building on our proud history.

OUR VALUES

Our values are a shared understanding across our people of what we stand for as an organisation. These values describe the things we strive for with both our internal and external stakeholders.

Integrity

We build trust by acting with honesty and transparency.

Collaboration

We achieve more by engaging and working together.

Accountability

We fulfil our commitments, take responsibility for our actions and celebrate success.

Adding value

We embrace excellence and innovation in what we do and how we do it.



Our governance and policies

Corporate governance framework

PoM is committed to maintaining strong corporate governance practices which help us to meet our legislative requirements and corporate governance standards.

The Safety and Sustainability Committee supports the PoM Board’s oversight of the delivery of the Sustainability Strategy, which includes management of modern slavery and human rights risks. The executive-level Sustainability Program Control Group has day-to-day accountability for management of human rights and modern slavery risks.

Our cross-functional Human Rights and Modern Slavery Working Group (**Working Group**) includes executive level leadership, together with representatives from Legal Services, People and Culture, Sustainability, Finance, Operations, and Corporate Relations. The Working Group supports the delivery of PoM’s modern slavery risk management, by facilitating employee training, engaging with suppliers and supporting community partners. Following the introduction of our internal Human Rights Policy in 2023, the Working Group’s focus has expanded from modern slavery to also include the human rights risks relevant to PoM’s operations.



Policies, codes, and frameworks

Our internal governance is supported by policies that are reviewed biennially and approved by our Board. The following policies support the management of modern slavery risks in our workforce and supply chain.

Supplier Code of Conduct

Our Supplier Code of Conduct outlines the principles and expectations that will guide our relationships with our suppliers. The Code outlines PoM’s expectations in respect of governance and business integrity, labour and human rights, environmental management, health, safety and wellbeing, stakeholder and community engagement, privacy, data protection and cybersecurity. It is PoM’s intention to partner with organisations who are aligned with our sustainability priorities to assist with reducing any potential instances of modern slavery in our supply chain.

Code of Conduct Policy

Our Code of Conduct Policy governs the conduct of our employees and contractors by establishing a clear, expected standard of behaviour and fosters a positive work environment where everyone’s rights are maintained. The Code of Conduct is supported by a suite of policies, frameworks, and guidelines, including the Appropriate Workplace Behaviour Guideline, which reflects PoM’s commitment to governance, anti-corruption, ethical conduct, equal opportunity, workplace health and safety, and privacy. It also outlines the formal support in place to assist employees with any concerns or grievances they may have.

Human Rights Policy

Our internal Human Rights Policy was approved by the Board in May 2023, and is informed by the *United Nations Guiding Principles on Business and Human Rights*. It outlines our principles for respecting and protecting human rights in our operations and supply chain, provides access to remedy for adverse human rights impacts, describes how we will apply the policy through our broader policy framework, and sets out the procedures for reporting actual or suspected breaches of the policy.

Whistleblower Policy

Our Whistleblower Policy provides a framework for PoM to respond to any reports of actual, or suspected misconduct, including instances of modern slavery.

It outlines the legal protections available for whistleblowers and sets out our procedures for receiving, handling, and investigating such reports, including PoM’s independent external service that enables eligible persons to make anonymous reports. The policy applies to all eligible persons including, but not limited to, directors, employees, contractors, suppliers, and their family members. PoM’s Whistleblower Policy provides an anonymous hotline which supports our internal and external stakeholders to speak up freely.

Sustainability Policy

Our Sustainability Policy sets the standard for how PoM will achieve our sustainability objectives and outlines the principles that guide the way PoM plans, operates, and makes business decisions. These principles include maintaining a safe, diverse, equitable and inclusive workplace, respecting and supporting the communities in which we operate, and managing sustainability risks and opportunities.

Diversity, Equity, Inclusion and Belonging Policy

Our Diversity, Equity, Inclusion and Belonging Policy sets out our commitment to workplace diversity and inclusion. It states what diversity and inclusion means to us and identifies the types of behaviours we expect of our employees to encourage a diverse and inclusive workplace.

Occupational Health, Safety and Wellbeing Policy

Our Occupational Health, Safety and Wellbeing Policy outlines PoM’s commitment to a safe and healthy environment for all employees, contractors, and visitors. It provides an overview of our health and safety policy objectives to maintain our health and safety management system, compliance with the relevant legislation, measurement and targets related to work-related injury and illness, workforce engagement on health and safety, and stakeholder relationship building to improve outcomes.

Procurement and Contract Management Policy and Guidelines

Our Procurement and Contract Management Policy and Guidelines outline the principles that guide our procurement activities. The policy reflects the value, risk, and complexity of each of our engagements and balances achieving commercial value with probity and efficiency. The policy sets out our commitment to ensuring PoM conducts appropriate due diligence and engages suppliers aligned to our sustainability, health and safety, cybersecurity and modern slavery principles.

Enterprise Risk Management Framework

Our Enterprise Risk Management Framework defines and identifies our risk appetite, risk management process, responsibilities across all levels of the organisation from our Board to employees, reporting requirements and our strategic approach to risk.

Reconciliation Action Plan

Our *Reflect* Reconciliation Action Plan sets out our commitment to promote Aboriginal and Torres Strait Islander rights and reconciliation through building relationships, deepening cultural respect, and creating opportunities between PoM and our First Nations stakeholders.

Our workforce

PoM’s workforce is comprised of diverse and skilled professionals with knowledge and experience in strategy, operations and engineering, property and finance, human resources, legal, and corporate relations.

All our employees are engaged in Australia under local employment laws. Recruitment is managed by our internal People and Culture team, supported by external recruiters for select roles. All recruitment and onboarding is overseen by our People and Culture team, in accordance with our Code of Conduct.

As at 30 June 2024, PoM employed 143 people. All our employees are based in our corporate office, located adjacent to the port in Melbourne’s Docklands, except for one employee based in Wagga Wagga in the Riverina region of New South Wales.

FY24 WORKFORCE PROFILE

Total employees*	143
Permanent contract	139
Fixed term contract	3
Casual	1
Contingent workers**	17
Percentage of employees covered by collective bargaining agreements	6%

*As at 30 June 2024

** PoM defines contingent workers as temporary workers with a limited tenure that are engaged to do work controlled by PoM and are employed as independent contractors, freelancers, or employees of PoM’s suppliers. PoM’s contingent workers are provided with a workspace and/or tools and complete mandatory compliance training modules including Appropriate Workplace Behaviour training. All contingent workers are employed in Australia.



Our supply chain

In FY24, PoM spent \$264 million on goods and services from more than 376 suppliers across several categories. Over 92% of our spend by value and 95% of our suppliers were based in Australia.

The remaining suppliers were based in North America, Europe and Asia-Pacific.

Supplier spend in Australia



INDUSTRY	INDUSTRY SPEND	% SPEND*
Construction work	\$171.8M	65.0%
Corporate business services	\$36.3M	13.7%
Asset maintenance and remediation	\$15.9M	6.0%
Utilities, infrastructure and public administration	\$26.1M	9.9%
Computer and IT software	\$7.9M	3.0%
Construction materials	\$4.1M	1.6%
Other products and services	\$2.2M	0.8%
Grand Total	\$264.4M	100%

*Note: any discrepancies are due to rounding

The most significant spend categories in FY24 were:

- **Construction work:** this includes suppliers who develop, construct, remediate and maintain PoM’s infrastructure assets such as wharves, roads, rail, and civil works as part of our capital projects. In FY24, this included the Swanson Dock West remediation project, the Webb Dock East Berth Knuckle project, and the Maintenance Dredging Program.
- **Corporate business services:** a range of businesses provide PoM with services including consultancy, IT, accounting, tax, audit, market research, cleaning, and waste services.
- **Utilities, infrastructure, and public administration:** PoM works with public authorities and other infrastructure managers to deliver port operations including services provided by rail, electricity, and water utilities.
- **Asset maintenance and remediation:** this includes suppliers that perform infrastructure operations, maintenance and remediation services including specialists in marine, electrical, real estate, civil infrastructure, and port security.
- **Construction materials:** this includes the procurement of materials and parts for our infrastructure assets.
- **Computer and IT software:** PoM uses a range of technical and general corporate IT and computer software.
- **Other products and services:** this includes a range of other goods and services. Most notably from a modern slavery perspective, it includes spend on Personal Protective Equipment (**PPE**), safety equipment and branded corporate goods.

Modern slavery risks

PoM acknowledges that there is a risk that modern slavery may be present in our operations and supply chain.

Therefore, PoM is continuing to explore practical approaches to ensure that our actions enable us to shape our operational and supply chain risk profile. PoM’s risks are divided into operational and supply chain risks. We believe this approach provides a clear view of the high risks areas and shows where PoM should prioritise its resources to understand, mitigate and continuously assess potential risks.

Operational risks

Given the nature of the employment arrangements for PoM’s workforce under the *Fair Work Act 2009* (Cth), our governance and policy framework, and employee training, we have assessed that the residual risk of exploitation of our employees is low.

Despite this low risk, we think that it is important to ensure that our employees are well-informed about modern slavery and human rights related risks in their roles and in their interactions within our supply chain. This information is communicated by:

- providing company-wide modern slavey information sessions; and
- ensuring that all new employees undertake mandatory modern slavery awareness training.

Supply chain risks

Understanding the risks of modern slavery in our supply chain remains a priority for PoM. In FY24, PoM had significant spend in the following areas of our supply chain. This is consistent with PoM’s reporting in our FY23 Modern Slavery Statement.

By spend:

- construction services for infrastructure development;
- utilities, infrastructure levies and public administration; and
- construction materials.

By category:

- PPE and other corporate goods; and
- facilities management services, including security, cleaning, and waste services.

These higher risk suppliers were identified following a risk assessment across PoM’s extended supply chain. Working with FairSupply, we used a risk profiling model to gain insights into PoM’s potential modern slavery risks from tier one to tier ten of our supply chain. FairSupply’s model uses proprietary technology to link global trade flow data with PoM’s supplier spend data, using multi-regional input-output data that captures the geographic location and industry of products and services in the extended supply chain. According to FairSupply, *“the risk rating is based on the estimated intensity of forced labour in a company’s supply chain.”*

This analysis enabled PoM to identify the categories, geographic regions, and tiers within our supply chain where the potential risk of modern slavery exposure is the highest so that we can be more targeted in our engagement with our supply chain moving forward. Implementing the Supplier Code of Conduct (as detailed below) underscores PoM’s commitment to addressing modern slavery and communicates to our suppliers that this issue is important to us.

Potential modern slavery risk exposure in our direct suppliers

FairSupply’s risk assessment model assigns a rating from high to low of potential modern slavery risks for each of PoM’s direct, tier one suppliers. The assessment model concluded that none of PoM’s direct suppliers pose a high potential for modern slavery risk. This assessment is based on a consideration of the supplier’s country of origin, industry, and the products and services they offer.

The initial ratings given by FairSupply were then refined for those suppliers who completed a self-assessment questionnaire. FairSupply sent questionnaires on PoM’s behalf to a number of higher risk suppliers to complete and provide us with more accurate and specific information about the risk minimisation practices the supplier has in place. All of the suppliers who were sent questionnaires completed the questionnaires and provided supporting documentation which sufficiently addressed PoM’s queries. This included construction partners, PPE providers, government and professional service providers, security providers, and cleaning and asset maintenance providers.

The questionnaire responses were used by FairSupply to calculate a residual risk after an assessment of the supplier’s risk management processes has been undertaken. For example, one of PoM’s suppliers was initially rated as having moderate-low potential for modern slavery risk however, this rating was adjusted to low after the self-assessment questionnaire was completed. As a result, none of higher risk suppliers who completed the questionnaires were rated as having a high potential for modern slavery risk.

The risk profile of the majority of PoM’s suppliers were rated as either low or moderate-low.

Modern slavery risks

RISK PROFILE	PROPORTION OF SUPPLIERS	PROPORTION OF SPEND	RELEVANT PRODUCTS OR SERVICES
Low	92%	94.6%	Construction services Corporate business services Port-related public administration services Stationery and office furniture PPE and safety equipment
Moderate-low	7.7%	5.4%	Construction materials Corporate business services Corporate branded goods Office catering
Moderate-high	0.3%	0%	Computer and related services
High	0%	0%	NA

Potential modern slavery risk exposure in our extended supply chain

In FY24, PoM used FairSupply’s platform to run further risk profiling assessments which has strengthened PoM’s understanding of our areas of highest modern slavery risk exposure. FairSupply’s modelling enables us to better understand the complexity and distribution of potential modern slavery risks across our extended supply chain from tier one to tier ten.

The modelling identified that:

- across ten tiers of our supply chain, 80% of potential modern slavery risk exposure is in Australia;
- 60% of modern slavery risk is in Australian construction work and materials; and
- the remaining potential risk exposure includes corporate business services, computer and related services and port-related public administration services sourced from suppliers based in North America, Europe, and Asia-Pacific.

Seafarers and port operations

Seafarers are part of PoM’s value chain, and we acknowledge that there are inherent modern slavery risks related to the shipping, cargo handling, and logistics industry. While these operations are outside of our reporting obligations under the Act, we recognise the importance of this issue and PoM has a number of initiatives in place to support seafarer welfare.

In FY24, over 2,600 ships visited the port and the seafarers crewing these vessels are vulnerable to the risk of modern slavery. The risk level ranges as working conditions vary and are difficult to assess due to fragmented regulatory oversight and complex supplier arrangements. PoM is aware of this vulnerability and, in FY24, has continued to provide financial support to our long-term community partners, Stella Maris and The Mission to Seafarers, whose objective is to support seafarer welfare.

Grievance mechanisms

As noted above, PoM has internal and external avenues for raising concerns regarding unethical behaviour or breaches of PoM’s policies, including those relating to fraud, harassment, or discrimination, misleading or deceptive conduct, unsafe work practices, and potential or actual instances of modern slavery. A report may be made anonymously using PoM’s independent external whistleblowing hotline service.

Effectiveness of Actions


Governance and Policy

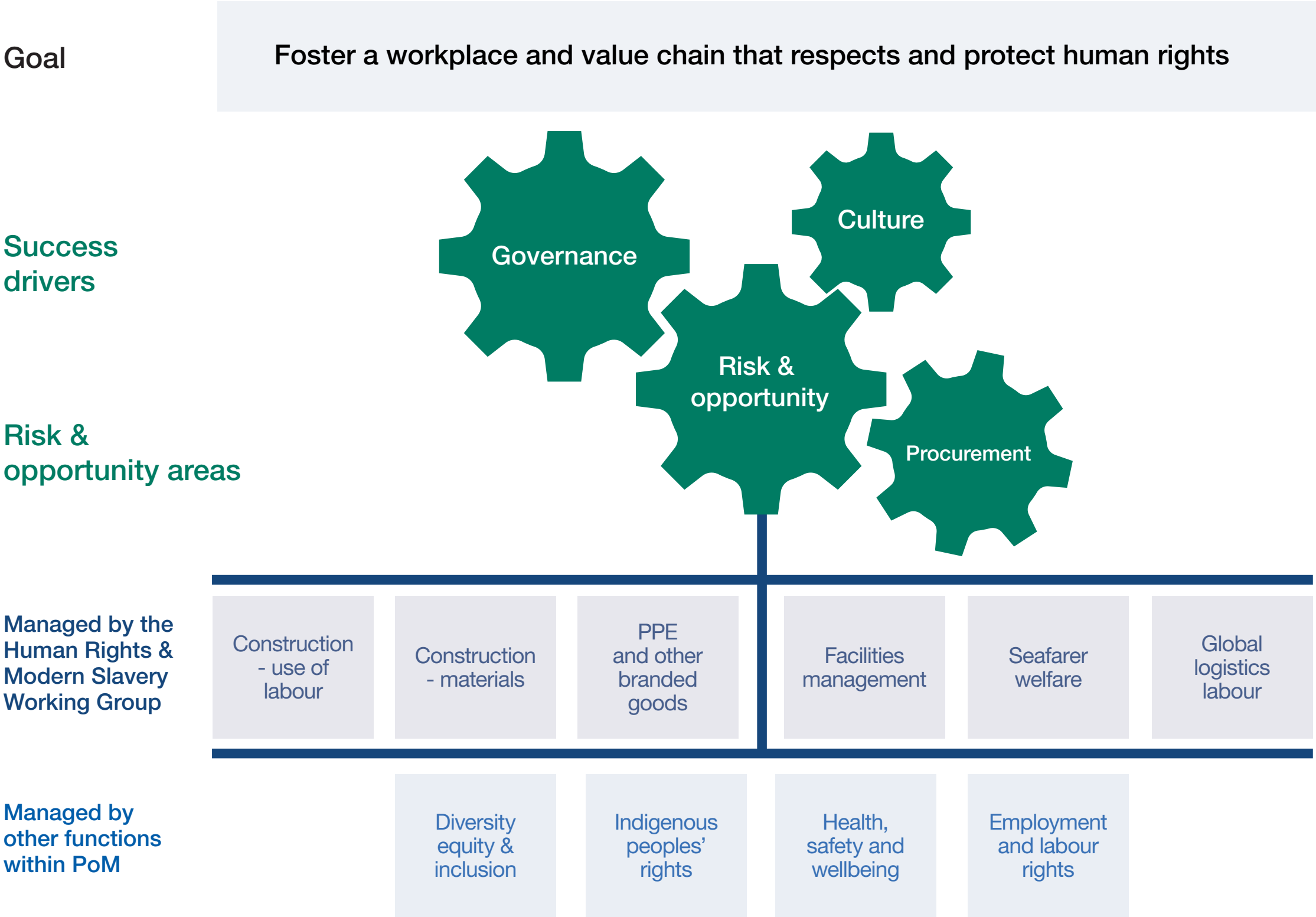
Human Rights and Modern Slavery Framework

In FY24, the Working Group developed its internal Human Rights and Modern Slavery Framework (the **Framework**) to strengthen PoM’s management of human rights and modern slavery risks.

The Framework incorporates the Working Group’s understanding of its key risks, identifies gaps in our current practices, sets out roles and responsibilities moving forward, and provides a roadmap for action. The Framework outlines the PoM’s goal of fostering a workplace and value chain that respects and protects human rights.

Effectiveness of Action: PoM completed the action of developing a framework to assist in identifying priority areas to strengthen our management of modern slavery and human rights risks.





The Framework notes that PoM will take a continuous improvement approach to embed and strengthen its performance in managing human rights and modern slavery.


Identify initiatives to achieve our priorities and objectives. Risks or issues identified through due diligence will be actioned.	INITIATIVES
Annual workplan identifies priorities for action and improvement.	ANNUAL WORKPLAN
The Framework outlines our objectives for maturing practice.	FRAMEWORK
Our Human Rights Policy sets out principles and commitments.	POLICY

Effectiveness of Actions

Develop relevant progress metrics

The Working Group is responsible for the implementation of modern slavery controls, monitoring their effectiveness and identifying opportunities to implement additional controls which may assist into mitigating the risk of modern slavery. The risk of modern slavery is captured in PoM’s corporate risk register as part of our Enterprise Risk Management Framework. All risks within the corporate risk register, including modern slavery, are reviewed by the Board on an annual basis. To support the risk register, in FY24, PoM commenced the development of a relevant progress metric (which includes both quantitative and qualitative measures) to enable PoM to track the delivery and effectiveness of our actions. The Working Group will continue to develop these progress metrics in FY25 to ensure that they enable PoM to accurately track the delivery and effectiveness of our actions.

Effectiveness of Action: The Working Group has developed the progress metric in accordance with its FY24 actions and will continue to build on this action in FY25.




Operational practices: Employee engagement and training

Modern Slavery Awareness Training

In FY24, a third-party provider was engaged to deliver training on modern slavery. This training focused on building employees’ awareness of the modern slavery risks

within our supply chain and provided practical strategies to address modern slavery risks when engaging suppliers and conducting our operations.

Effectiveness of Action: Overall, 79% of employees completed the training in FY24, with the remaining 21% of employees to complete the training in FY25.




Other Relevant Training

All employees are required, on a biennial basis, to complete a series of e-learning courses, which focus on appropriate workplace behaviour, PoM’s Whistleblower Policy, and Financial Code of Practice. A brief description of each course is outline below:

- **Appropriate Workplace Behaviour training** outlines the standards and expectations of employees for appropriate behaviour in the workplace, including the obligation to act ethically, with integrity, and in the best interests of PoM.
- **Whistleblower Policy training** outlines PoM’s obligations under state and federal whistleblower legislation, whistleblower protections, reporting processes, and investigations of reportable conduct.
- **Financial Code of Practice training** outlines the standards of conduct for employees in relation to financial dealings and details the internal controls in place to prevent, manage and report any suspected or actual incidents.

These e-learning modules are also included in PoM’s induction training program and are mandatory for all new starters.

Effectiveness of Action: In FY24, all 45 new starters (31 permanent and 14 contingent workers) completed the series of e-learning modules. This mandatory training was last delivered to all PoM employees in FY23, with 99% of employees having completed all modules. This training will be deployed business wide in FY25.




Port Education Centre

As part of PoM’s port education service, we offer an education program to schools which explores the port’s operations, maritime engineering and how goods are transported around the world. The program is designed to share and build knowledge about the importance of port management.

The program includes classroom education and guided tours around the port boundary for primary, secondary, and tertiary students. Program materials are tailored to align with Australian National Curriculum topics and include content to educate students on modern slavery and human rights risks in the maritime industry.

Effectiveness of Action: In FY24, PoM delivered 36 port education school sessions to 1170 students from 23 schools across Victoria creating greater awareness amongst students as to the risk of modern slavery.



Operational practices: Seafarer welfare

This year, PoM continued to provide ongoing financial support to our long-term community partners, Stella Maris and The Mission to Seafarers, whose objectives are to support the welfare of seafarers.

Collaborative on seafarer initiatives

PoM engaged with state and national organisations on seafarer welfare in FY24. In October 2023, PoM attended the national Port Welfare Committee Forum along with a range of welfare organisations, services, the Australian Maritime Safety Authority (**AMSA**), peer ports and industry. The forum aimed to identify and prioritise seafarer welfare needs and to encourage connectivity and collaboration on seafarer welfare.

A key outcome was mapping the accessibility of existing services and identifying essential, extended, and desirable services that are, or should be made, available at ports.

Seafarer Survey - Pilot Program

PoM worked with AMSA to pilot a survey on seafarers’ welfare needs in FY24. The survey built on the work of the Port Welfare Committee Forum and wanted to hear directly from seafarers on their welfare needs and compare those needs to existing available services. PoM was a trial port to conduct the survey and gather learnings before AMSA extended the survey to all ports nationally.

PoM worked with AMSA to draft the survey and engaged four stevedores and the local seafarer welfare centres to promote the survey. The survey was open from April-May 2024. Despite the low response rate there were significant learnings about how to promote the survey. PoM will support the nationwide rollout of the survey in FY25.

Effectiveness of Actions

Community Partnership Agreements

In FY24, PoM continued to partner with, and provide financial support to, Victoria's two seafarer welfare charities, Stella Maris and The Mission to Seafarers. In addition to our annual financial contribution, PoM provided both charities with 100% of the proceeds from our community boat tour program. To assist with educating the community about modern slavery risks to seafarers, both charities presented at PoM's community boat tour program in FY24.

PoM has partnered with both charities to support seafarer welfare since 2014. In FY24, we formally extended these partnerships until 30 June 2026. The partnership agreements allow for both charities to help PoM better understand the needs of seafarers by providing information relating to reports of modern slavery, the effectiveness of programs run for the benefit of seafarers, and community engagement. We hope this data will provide PoM with a greater understanding of the issues impacting seafarers and ensure that any assistance is directed to best support their needs.

Effectiveness of Action: PoM met its FY24 goal of continuing to work with relevant stakeholders to identify initiatives to enhance seafarer welfare in a manner appropriate to our role as a landlord port.



Supply chain practices

Develop a Supplier Code of Conduct

In FY24, PoM drafted its Supplier Code of Conduct. As noted above, the Supplier Code of Conduct outlines the principles and expectations that will guide our relationships with suppliers. This includes PoM's expectations around governance and business integrity, labour and human rights, environmental management, health, safety and wellbeing, stakeholder and community engagement, privacy, data protection and cybersecurity. PoM's intention is to partner with organisations who are aligned with our sustainability priorities to reduce any potential instances of modern slavery in our supply chain.

Further communication with suppliers is planned in FY25, together with internal training for PoM contract managers to assist with the implementation and communication of the Supplier Code of Conduct.

Effectiveness of Action: PoM completed the action of developing a Supplier Code of Conduct.



Engage with our highest risk suppliers

As noted above, in FY24, PoM invited our higher risk suppliers to complete self-assessment questionnaires to give us a better understanding of the policies, practices and processes that they have in place to mitigate the risk of modern slavery. The questionnaires were issued by FairSupply on PoM's behalf and the results were used to adjust the inherent risk assessments made using FairSupply's analysis.

It was encouraging to note that 89% of the respondents had policies and processes in place that specifically addressed modern slavery in their operations. 78% of the respondents had provided employee training that specifically addressed modern slavery issues to at least 50% of their employees. Further, 67% of the respondents have a formal remediation mechanism in place which can be implemented if instances of modern slavery are identified, with a further 22% of respondents have committed to implementing similar mechanisms in the next 12 months.

These insights will guide our ongoing efforts to reduce the risk of modern slavery within our operations and supply chains.




Effectiveness of Action: The questionnaires were completed by 100% of recipients and, as a result, PoM is more informed about the policies, practices and processes that our higher risk suppliers have in place to mitigate the risks of modern slavery.



Our forward focus

PoM is committed to identifying, mitigating, and reducing modern slavery risks from our operations and supply chains.

In future reporting periods, we will continue to build on our efforts by undertaking the following actions:






ACTION AREA	FOCUS
<div> Governance and policy</div>	<p>Develop a risk register Develop a risk register as part of a due diligence system to identify and assess the risks of modern slavery.</p> <p>Review the reporting process Review PoM’s internal processes to ensure there is a procedure in place to assist with reporting under the policy and outlining PoM’s response (both internally and externally) when an instance of modern slavery occurs.</p>
<div> Supply Chain Practices</div>	<p>Implement the Supplier Code of Conduct Work with PoM’s suppliers to implement the Supplier Code of Conduct to ensure that PoM’s standards and expectations regarding modern slavery and human rights practices are effectively communicated.</p> <p>Review the Procurement and Contract Management Guidelines Review PoM’s existing Procurement and Contract Management Guidelines to ensure that modern slavery and human rights practices are considered and prioritised when engaging with new suppliers.</p>
<div> Operational Practices</div>	<p>Tailored training Build on PoM’s program of developing and delivering tailored training for procurement employees to support the review of the Procurement and Contract Management Guidelines.</p> <p>Collaborate on seafarer initiatives Analyse the data provided by Stella Maris and The Mission to Seafarers to gain a greater understanding of potential programs and initiatives that could be implemented to enhance seafarer welfare in a manner appropriate to our role as a landlord port.</p>





Appendices

Appendix One: Priority Risk Areas

POTENTIAL RISK	IMPACTED GROUPS	MITIGATING ACTIONS
<div> Construction labour</div>	<p>PoM engages construction companies to undertake infrastructure development and upgrade works in the port.</p> <p>Construction companies often work with complex supply chains that may include labour hire arrangements. Potential labour exploitation issues in Australia include substandard working conditions (including poor health and safety practices), unfair hours and unfair pay. Less commonly, cases of human trafficking, debt bondage, withholding passports and threatened violence have been recorded in the industry.</p>	<ul style="list-style-type: none">• Supplier self-assessment questionnaire• PoM's Procurement and Contractor Management Policy and Guidelines• Inclusion of modern slavery clauses in supplier contracts• PoM's integrated safety management system• Safety Subordinate Risk Register for Contractors• Contractor Safety and Environment Management Procedure• Regular construction site inspections
<div> Construction materials</div>	<p>PoM procures construction materials including cement, steel, and fabricated metal products to undertake infrastructure development and upgrade works in the port.</p> <p>Materials and large equipment are often sourced from international manufacturers in high-risk industries and/or geographies with limited working condition controls.</p>	<ul style="list-style-type: none">• PoM's Procurement and Contractor Management Policy and Guidelines
<div> Facilities management services</div>	<p>PoM procures facilities management services, including security, cleaning, and waste services, from suppliers.</p> <p>These services are at higher risk of modern slavery due to a high level of subcontracting, reducing oversight of employee working conditions. These industries also employ a greater representation of people from vulnerable populations such as base-skilled workers, workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds.</p>	<ul style="list-style-type: none">• Supplier self-assessment questionnaire• PoM's Procurement and Contractor Management Policy and Guidelines• Inclusion of modern slavery clauses in supplier contracts• Tender processes include questions relating to the management of modern slavery risk and sub-contracting policies
<div> PPE and other corporate goods</div>	<p>PoM procures PPE and other corporate goods such as office furniture and branded merchandise.</p> <p>These products may be mass produced at low cost, procured from countries in high-risk geographies, or made by workers from vulnerable backgrounds.</p>	<ul style="list-style-type: none">• Supplier self-assessment questionnaire• PoM's Procurement and Contractor Management Policy and Guidelines• Engagement with direct suppliers about their approach to managing modern slavery risks
<div> Seafarer welfare</div>	<p>Seafarers are vulnerable to modern slavery risks due to the complex employment arrangements that can include separate crew agents, ship operating companies and vessel managers. In addition, regulation and oversight of seafarer welfare is fragmented due to the global nature of this industry. Exploitation issues can include bullying and harassment, refusal of shore leave, untreated injuries, no access to fresh food, withholding of wages, withholding of identification documents and overtime .</p>	<ul style="list-style-type: none">• Ongoing partnership and financial support to two seafarer organisations who support the welfare of seafarers visiting the port

Appendix Two: Mandatory reporting criteria

	MODERN SLAVERY ACT 2018 (CTH) CRITERIA	REFERENCE IN THIS STATEMENT	PAGE
1	Identify the reporting entity and any entities the reporting entity owns or controls	About this Statement	Page 3
2	Describe the reporting entity’s structure, operations, and supply chains	About Port of Melbourne	Page 6
3	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	Modern slavery risks	Page 13
4	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 processes	Effectiveness of actions	Page 15
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Effectiveness of actions	Page 15
6	Describe the process of consultation with any entities the reporting entity owns or controls	Consultation and approval	Page 3
7	Other relevant information	Our forward focus	Page 18

Contact us

Port of Melbourne welcomes feedback and questions about this Statement and our sustainability program.

Head Office

Level 19, 839 Collins Street, Docklands Victoria 3008
GPO Box 2149 Melbourne Victoria 3001

Phone: +61 1300 857 662

Email: sustainability@portofmelbourne.com

www.portofmelbourne.com



@portofmelbourne

Port of Melbourne

