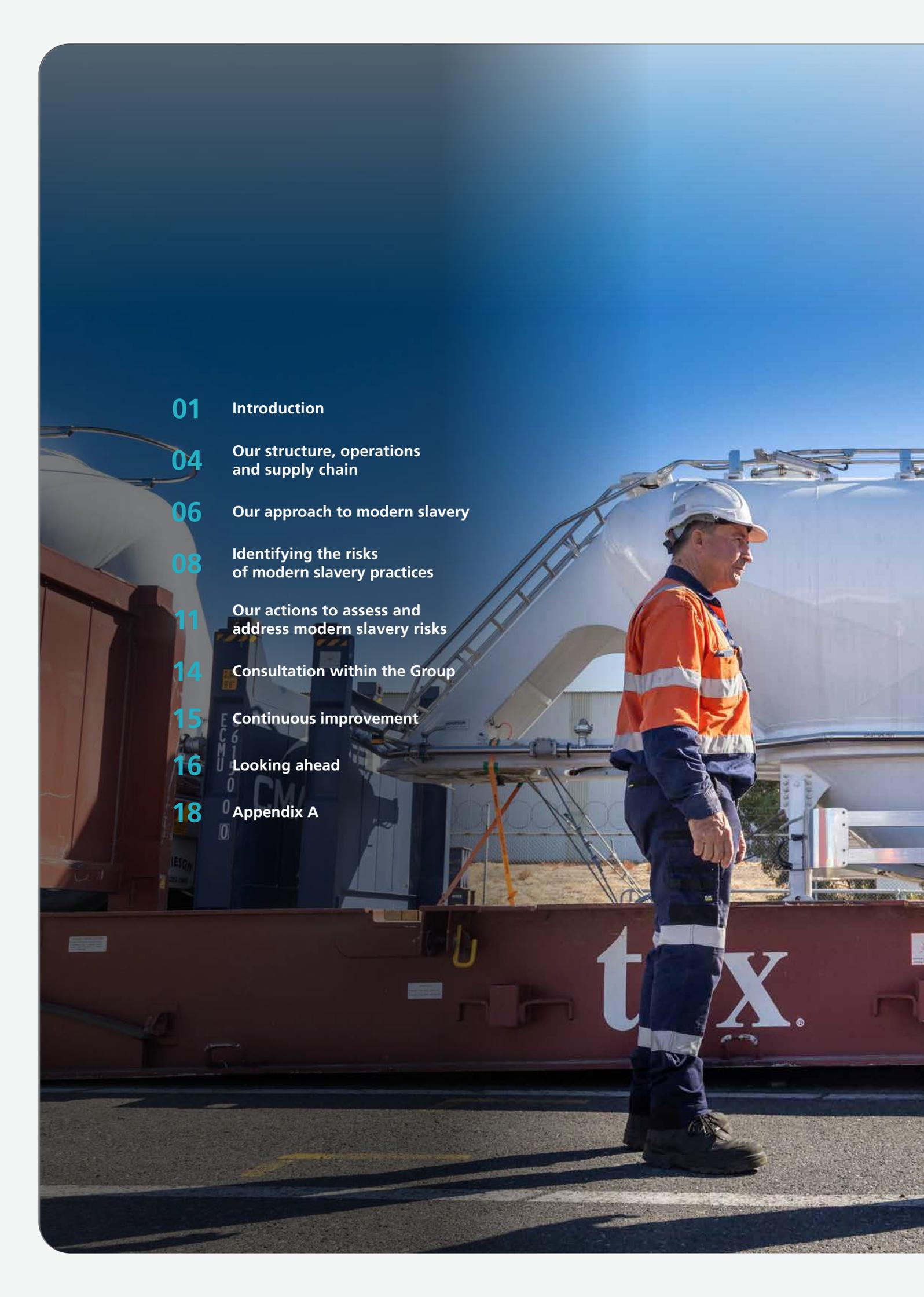


FY'25

Modern Slavery

Statement



01	Introduction
04	Our structure, operations and supply chain
06	Our approach to modern slavery
08	Identifying the risks of modern slavery practices
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Introduction

At Flinders Port Holdings Pty Ltd (**FPH**) we believe a sustainable business is one that acts positively to achieve sustainable outcomes, minimising harm, being at one with our communities and the environment and ensuring the financial resilience of our operations now and in the future.

In line with its approach to sustainability, FPH and its subsidiary companies, identified in Appendix A (together, the **Group, we, or us**), have continued their commitment to addressing the risk of modern slavery practices in their operations and supply chains.

The Group strives to consistently demonstrate high standards of ethical conduct and to uphold human rights, fair working conditions and to engage in sustainable and environmentally sound business practices. We endeavour to always operate responsibly and expect the same from our suppliers.



Sustainability and combatting modern slavery

FPH, as a leading port infrastructure provider, port services operator and logistics services provider, plays an essential role in the South Australian economy. Our vision is “Connecting South Australia with the World”. Our mission is “to be an industry leader in providing safe, innovative and sustainable port-related infrastructure, capabilities and services that enable, optimise and maximise trade for our customers”.

Both our vision and our mission are underpinned by the recognition that creating long-term shareholder value is inextricably linked to, and not at the expense of, creating value for other stakeholders. Sustainability is one of the guiding philosophies in the way we operate and in our future planning and development. In line with our Value Creation Model (VCM), our approach to sustainability will see the Group develop more resilient infrastructure, more efficient operations and an organisational culture that builds on our values.

In developing its current Sustainability Plan, the Group conducted a sustainability materiality assessment to identify, define and prioritise the Environmental, Social and Governance (ESG) topics that matter most to the Group and its external stakeholders, and that reflect the impact on our people, community, environment and internal governance. As part of this process, ethical sourcing, labour rights and business ethics and transparency were all identified as material to FPH.

In conducting its materiality assessment, developing and implementing its [Sustainability Plan 2022-2025](#), the Group was informed by a number of key global ESG reporting frameworks. In particular, we have identified nine of the United Nations (UN) Sustainable Development Goals (SDGs) as goals that FPH can most contribute to.

Relevant to our approach to modern slavery compliance, one of these goals relates to SDG 8.7 which requires organisations to “take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms”.



As part of our sustainability commitments in our Sustainability Plan, FPH is a signatory to the UN Global Compact. UN Global Compact signatories, such as FPH, voluntarily pledge to operate responsibly, in alignment with universal sustainability principles. These 10 universal sustainability principles include several under the themes of Labour and Human Rights that are relevant to our approach to modern slavery compliance, including that businesses should:

Principle 1

Support and respect the protection of internationally proclaimed human rights;

Principle 2

Make sure that they are not complicit in human rights abuses;

Principle 4

Uphold the elimination of all forms of forced and compulsory labour; and

Principle 5

Uphold the effective abolition of child labour.

In 2025, FPH engaged an independent consultant to conduct an updated materiality assessment in preparation for our next reporting period.

This involved analysis of trends and emerging issues, stakeholder engagement, and thorough analysis to identify and prioritise key sustainability issues for FPH.

The updated FPH Sustainability Materiality Assessment was completed in March 2025. Survey analysis indicates that stakeholders continue to expect FPH to uphold sustainable procurement and supply chain practices and responsible procurement remains critical to maintaining trust, meeting regulatory expectations and mitigating risks across the supply chain.

About this Statement

In FY'25, FPH and its subsidiaries, Flinders Ports Pty Ltd (**FP**) and Flinders Adelaide Container Terminal Pty Ltd (**FACT**), were 'Reporting Entities' for the purposes of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This is the joint Modern Slavery Statement (**Statement**) of those reporting entities, submitted to meet the reporting requirement in the Modern Slavery Act.

This Statement describes the actions taken by those entities, and the entities they control, to identify, manage and mitigate the risks of modern slavery in their operations and supply chain during the financial year ending 30 June 2025 (**reporting period**). The Statement outlines the program of work that the Group has undertaken in the sixth reporting period to leverage our more mature risk assessment processes to further embed our modern slavery response plan.

Our structure, operations and supply chains

About us

FPH is South Australia's leading port infrastructure provider, delivering integrated supply chain solutions, stevedoring and hydrographic survey services across our Group of companies.

We are proud of our role in the economic development of the state and the wellbeing of its port communities.

Our operations

In line with the 'reporting requirement' in the Modern Slavery Act, this Statement describes actions that have been undertaken by the Group in the FY'25 reporting period, to assess and address the risks of modern slavery practices in the **supply chain** and **operations** of each company within the Group.

FPH owns and operates Flinders Adelaide Container Terminal, the port of Port Adelaide as well as the six key regional ports of Port Giles, Port Lincoln, Wallaroo, Port Pirie, Klein Point and Thevenard. In the reporting period, FPH completed the divestment of Flinders Logistics Pty Ltd and its wholly owned subsidiary Pirie Bulk Pty Ltd. The Group entities during FY'25 are as listed in Appendix A.

The Group had an annual turnover of \$294.86M in FY'25 and, as at the end of the reporting period, employed 674 people.

Financial Year 2025

674

Total employees

20+

million

Tonnes of cargo shipped through our Ports

290+

million

Annual turnover

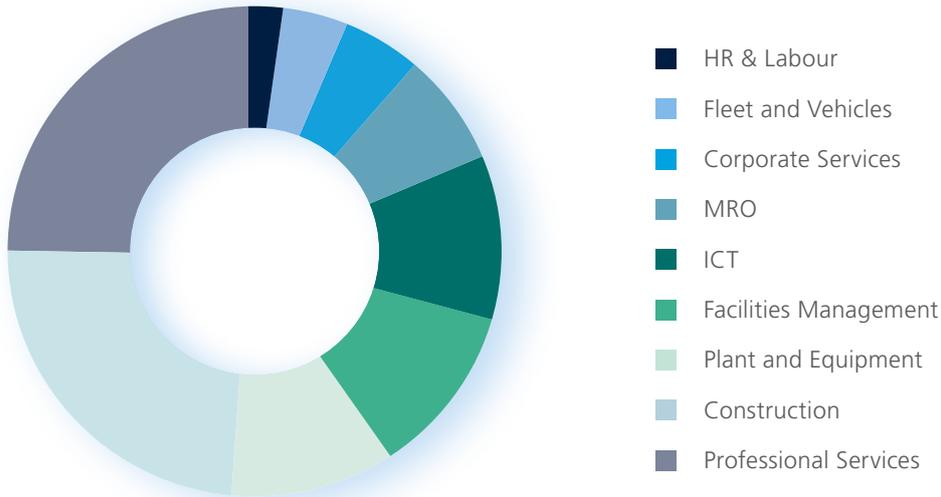
70+

million

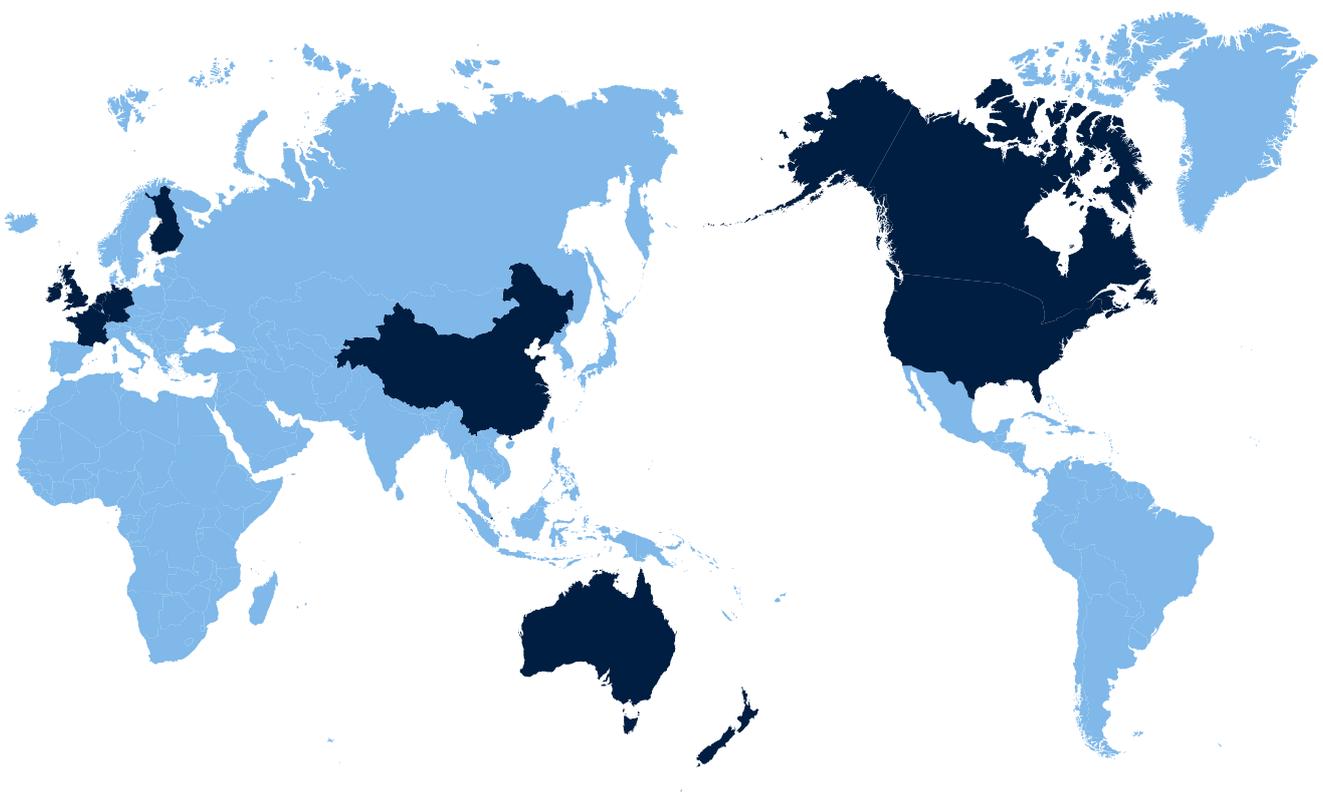
Invested in port infrastructure

Our supply chain

In the reporting period, the Group made payments to 2,810 Tier 1 suppliers (meaning those suppliers that deal directly with the Group). The Group’s major categories of procurement included:



The majority of suppliers and contractors that provided goods and services procured by the Group during the reporting period were based in Australia. Our relatively low percentage of overseas suppliers (accounting for 1.06% of all suppliers in the reporting period) included vendors based in the following locations (as highlighted in blue on the map below): Belgium, Canada, China, Finland, France, Germany, Ireland, Netherlands, New Zealand, Singapore, UK and USA.



Our approach to modern slavery

We are committed to ensuring that risks of modern slavery practices in our operations and supply chains are effectively identified and addressed.

The term 'modern slavery' is used in the Modern Slavery Act to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine, or deprive them of, their freedom. The Modern Slavery Act defines modern slavery as including the following conduct: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Our approach to combatting modern slavery focuses on embedding our modern slavery response as a core element of the Group's values, culture and conduct.

Policy documentation

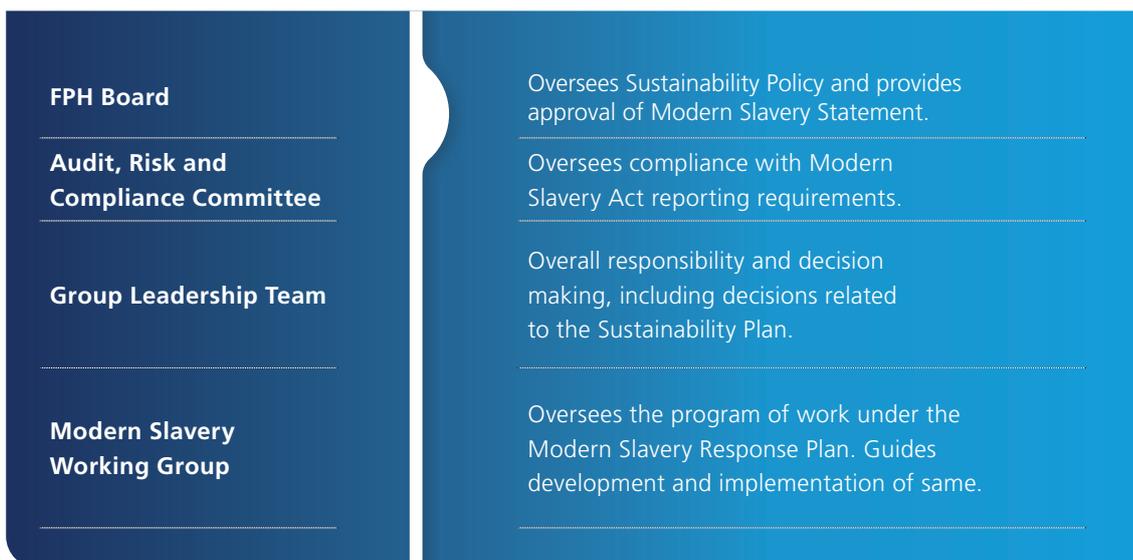
In line with our Sustainability Policy and accompanying Sustainability Plan, the Group aims to foster an organisational culture committed to corporate social responsibility, including the recognition of human rights. The Group has developed a number of frameworks, policies, plans and codes that underpin our modern slavery response plan and inform our overall approach to modern slavery compliance.

This key documentation includes:

- Sustainability Plan
- Sustainability Policy
- Procurement Policy
- Modern Slavery Supplier Risk Management Framework
- Supplier Code of Conduct
- Group Procurement Framework
- Procurement and Supply Group Policy
- Whistleblower Policy

Modern Slavery Governance

To support the implementation of our policy documentation and modern slavery response plan, our governance framework has been designed to enable effective oversight, monitoring, risk assessment and reporting. In the reporting period, we streamlined our reporting and oversight channels regarding sustainability actions, noting that many members of our previous Sustainability Steering Committee were also members of the Group Leadership Team. Accordingly, the diagram below outlines the governance structure that supports our Modern Slavery Working Group in driving the program of work under our modern slavery response plan:



Supplier due diligence

Our relevant template supplier agreements contain specific modern slavery compliance clauses which have been drafted in consideration of our obligations under Australian anti-slavery legislation, including the Modern Slavery Act.

Since April 2020, we have provided a mandatory modern slavery supplier questionnaire (Supplier Questionnaire) to our new suppliers in our Vendor Application Pack. In the previous reporting period, we updated our Vendor Application Form and amended and updated our **Supplier Questionnaire** to ensure that our vendors' responses better assist our Procurement team to conduct a modern slavery risk assessment at the critical pre-approval stage.

Our tendering platform captures all compliance documents from all approved vendors, providing a centralised repository for supplier compliance monitoring. This reporting period, we have identified our Supplier Code of Conduct for review, which we intend to progress in FY'26.

To further enhance communication with our suppliers about our approach to sourcing, including regarding ethical sourcing, we published our [Procurement and Supply Group Policy](#) to our website.

Identifying the risks of modern slavery practices

Understanding and assessing our modern slavery risk

Under the Modern Slavery Act, we understand that the term **'risks of modern slavery practices'** refers to the potential to **cause, contribute to**, or be **directly linked to** modern slavery through the operations and supply chains of the Group and we focus our risk assessment accordingly.

Risks that the Group may **contribute to** modern slavery practices include any acts or omissions that may facilitate or incentivise modern slavery.

Risks that the Group may be **directly linked to** modern slavery practices means the risks that the Group's operations, products or services may be connected to modern slavery through the activities of another entity that any of the Group's entities has a business relationship with (e.g. a supplier).

In the development of all our risk assessment methodology, we carefully consider the Australian Government's guidance on modern slavery risk indicators in the *Commonwealth Modern Slavery Act 2018- Guidance for Reporting Entities (Australian Government's Modern Slavery Reporting Guidance)*. In particular, we focus on the 'key risk indicators' in the Australian Government's Modern Slavery Reporting Guidance: our sector and industry risk; product and services risk; geographic risks and entity risks.

Operations

In assessing and addressing the modern slavery risks in our operations, the Group has determined (as confirmed by external specialist ESG risk assessors in previous reporting periods) that it has a relatively low exposure to modern slavery risks through its direct employment of workers.

The Group directly employs most of its 674 strong workforce. Our staff are employed on contracts which are either compliant with the *Fair Work Act 2009* (Cth) (**Fair Work Act**) or Enterprise Agreements approved by the Fair Work Commission. Australia's Fair Work system, the national workplace relations system created by the Fair Work Act, includes mechanisms aimed at protecting vulnerable workers.

However, we acknowledge that we are exposed to some potential risk of modern slavery practices through our use of third-party labour-hire arrangements to supplement our workforce and support our operations. We recognise that we have less visibility and control over these workers and their employment terms and conditions. In South Australia, where the Group operates, the *Labour Hire Licensing Act 2017* (SA) requires that labour hire service providers be licensed. One of the objects of the legislation is to protect workers from exploitation, including by generally prohibiting the use of unlicensed labour providers.

Accordingly, we take steps to ensure compliance with that legislation, and manage the risk of modern slavery, by engaging with licensed labour hire providers with standing agreements in place with the Group.

While the Group provides port related services to foreign vessels, we do not control the operations of those vessels. This limits our oversight and impact on the working conditions of the crew on board. Additionally, we understand that there is a globally recognised wider potential risk that ports may provide entry points for human trafficking and that the shipping industry is considered higher risk due to its exposure to key risk indicators such as the geographic locations of the workforce. However, the Group's risk profile is likely reduced in the Australian context, due to our more remote geographic location.

Relevantly, we maintain a co-operative working relationship with authorities that oversee the activities of foreign vessels, including Australian Border Force and the Australian Maritime Safety Authority (which is responsible for ensuring international conventions relating to maritime safety are upheld). We also assist with facilitating and enabling the work of the Australian Seafarers' Welfare Council and other associated seafarer welfare organisations that operate to support the welfare of seafarers onboard vessels using our ports.

If we were to become aware of allegations of modern slavery in relation to a vessel, we would cooperate with relevant regulators and stakeholders as required.

Our Group Modern Slavery 3 Year Action Plan, includes an action for 'Reviewing Group engagement with seafarer support organisations' and we intend to progress this action in FY'26 (year 3 of the plan).

Our Whistleblower Policy is an important reporting mechanism to assist us to identify any risks of modern slavery in both our operations and supply chain. This document, publicly available on our website, includes instructions to enable internal and external parties to raise concerns that may relate to our operational modern slavery risk via the independent FairCall reporting platform, which operates 24 hours every day. Specific Whistleblower Policy training is included in our employee induction pack to ensure that all employees know how to access our reporting platform.

To support these measures, and further assist our employees to identify the risks of modern slavery practices in our operations, we delivered modern slavery awareness training via our electronic training platform in the reporting period. The modern slavery training module was rolled out to a targeted group of 139 people, including Group Leaders; as well as Procurement and Governance team personnel. By the end of the reporting period, 91 personnel (approximately 65%) had completed the modern slavery training module.

Supply chain

In the reporting period, the Group's Procurement team continued to leverage its spend analysis software solution to assess supplier risk. This tool provides a specific 'Modern Slavery' risk analysis dashboard with a risk heat map (updated every 3 months).

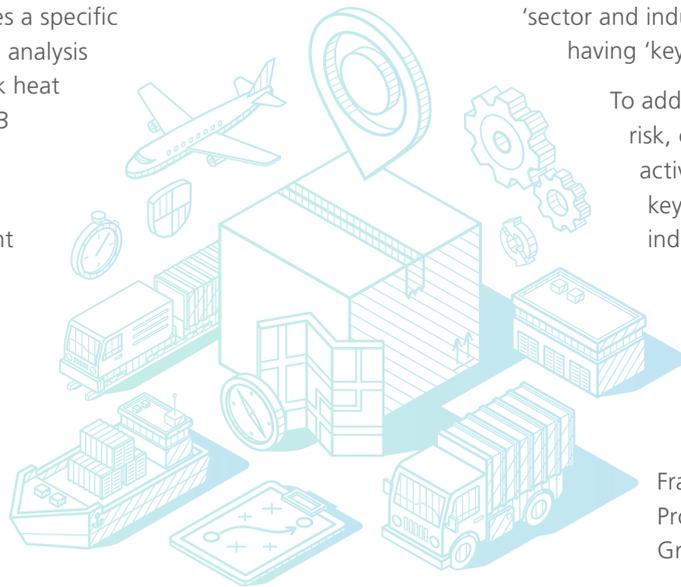
Overall, the findings of this risk assessment continue to indicate that the Group has a comparatively low financial exposure to higher risk suppliers, with suppliers that could be categorised as high-risk representing 4.3% percent.

The slight increase in this number (from 2.2% in our previous reporting period), is partly attributed to the increase in specific sub-categories of our supplier spend in the 'Facilities Management' category. This spend category accounted for 10.84% of our suppliers in the reporting period, and includes suppliers of both cleaning and security services.

The cleaning and security industries have been identified in the Australian Government's Modern Slavery Reporting Guidance within the 'sector and industry' risk category as having 'key risk indicators'¹.

To address this potential risk, our Procurement team actively engages with our key cleaning and security industry suppliers, to communicate our expectations regarding ethical sourcing, in line with our Supplier Risk Management Framework and Procurement and Supply Group Policy.

Our tendering platform, supported by our enhanced Vendor Application Pack documents (including Vendor Application Form and Supplier Questionnaire) assists us to identify and monitor any potential supply chain risks at the critical pre-approval stage, so that these can be proactively mitigated and/or managed.



¹ Attorney-General's Department, *Commonwealth Modern Slavery Act 2018- Guidance for Reporting Entities* (May 2023) page 81.

Our actions to assess and address modern slavery risks

Assessing the effectiveness of our actions

OUR PLAN

In this, our sixth reporting period, we continue to embed and refine our modern slavery response plan, a high-level plan that drives our actions for addressing risks of modern slavery in our supply chain and operations. The diagram below captures the core elements of that plan. Our modern slavery response plan takes a targeted and continuous improvement approach that focuses on our Tier 1 suppliers and on key areas and associated tasks.

We have continued to implement and embed this modern slavery response plan. This program of work has, as in the previous reporting periods, been overseen by a dedicated Modern Slavery Working Group, comprised of relevant senior personnel and with participation from specialist external providers.

Assess & Identify

- Conducting a comprehensive modern slavery risk assessment

Action

- Undertaking supplier onboarding and contract review
- Developing and implementing policies and procedures
- Conducting training/awareness
- Establishing a Modern Slavery Working Group to oversee the program of work
- Embedding reporting channels

Review

- Reviewing actions against our Modern Slavery Response Plan

Our Performance

Consistent with our continuous improvement approach, the Modern Slavery Working Group has progressed the following work under our modern slavery response plan.

KEY AREA	PLANNED TASKS	FY'25 PROGRESS
ASSESS AND IDENTIFY		
Risk assessment	Leveraging our enhanced vendor onboarding approach to identify opportunities to further refine our supply chain risk assessment.	In the reporting period, the Group revised its Risk Management Framework. We also identified that our Supplier Code of Conduct needs to be reviewed. We intend to progress this review in FY'26. The Modern Slavery Supplier Risk Management Framework is under review to align with the Risk Management Framework, and further revisions will be necessarily informed by the Supplier Code of Conduct review.
ACTION		
Training, awareness and capacity building	Delivering targeted modern slavery awareness training modules for employees via our new training platform.	In May FY'25, the Group rolled out modern slavery training via its online training platform to 139 people, including: Group Leaders; Procurement and Governance team personnel. By the end of the reporting period, 91 personnel had completed the modern slavery training module.
	Continuing to explore options for delivering supplier modern slavery awareness training via contractor management	In the reporting period, the Group commenced a 'Contractor Management System' project. That system may have capability to deliver training, and the Group is currently defining project needs.
	Collaborating with our Tier 1 suppliers and industry peers regarding modern slavery compliance supply chain activities and industry best practice.	Our key personnel hold individual membership with peak professional bodies and are actively engaged with peers on collaborating to ensure best practice in supplier risk management. A member of our MSWG is a participant of the South Australian Modern Slavery Network Lead Group. In the reporting period, we maintained our status as an active participant in the UN Global Compact became corporate members of World Commerce and Contracting (World CC).
Policy and procedure development	Updating and monitoring of our Group 3 Year Modern Slavery Action Plan	We continue to revise, refine and monitor the effectiveness of our Group 3 Year Modern Slavery Action Plan, which is due to be refreshed in the next reporting period. In regard to policy and procedure implementation more broadly, during FY'25 we published our Procurement and Supply Group Policy on our website, to enhance communication with our stakeholders regarding our approach to procurement and sourcing, including ethical sourcing.

KEY AREA**PLANNED TASKS****FY'25 PROGRESS****REVIEW**

Performance assessment

Updating our modern slavery response plan.

Our modern slavery response plan (based on our 'Looking Ahead' section in the previous Modern Slavery Statement), is updated each MSWG meeting, depending on the status of actions, and includes a number of ongoing actions. For more on this, please see the 'Looking Ahead' section.

Reviewing our training program

Our Modern Slavery training online training program is scheduled for a detailed review in 2026.

Reviewing and refreshing materiality assessment and sustainability plan.

In 2025 FPH engaged an independent consultant to conduct an updated materiality assessment. This involved analysis of trends and emerging issues, stakeholder engagement, and thorough analysis to identify and prioritise key sustainability issues for FPH.

The updated FPH Sustainability Materiality Assessment was published in March 2025. Survey analysis will be used to inform our next sustainability plan.

Consultation within the Group

Our internal consultation regarding this Statement reflects the collaborative approach the Group takes to the consistent implementation of its compliance activities across its business units and entities. The Group's entities share a common Board of Directors and Group Leadership Team, who are updated on activities regarding modern slavery compliance, including during the Statement approval process.

Staff from our Procurement, Legal and Sustainability teams are involved in our modern slavery response plan actions through their participation in our Modern Slavery Working Group.



Continuous improvement

The Group is committed to continuously improving its understanding and management of its modern slavery risks, as demonstrated by our investments in further developing our risk controls, including the procurement of licenced training modules for delivering modern slavery training. In addition, the Group continues to draw from the experiences of navigating modern slavery compliance from industry peers and networks, including by becoming a corporate member of the of World CC in this reporting period.

Staff and key personnel, including from our Procurement team, are closely engaged with groups that inform best industry practices in supply chain management. This helps to ensure that relevant teams and roles within the Group are continuing to build capacity and expertise, particularly in our management of supply chain risk.

The Group, members of its Modern Slavery Working Group, and/or some of its key personnel are members of a number of peak industry bodies and collaborative peer groups including:

- Chartered Institute of Procurement and Supply (**CIPS**);
- Procurement and Supply Australasia (**PASA**);
- World CC; and
- South Australia Modern Slavery Network business sub-group, facilitated by the University of South Australia's Centre for Enterprise Dynamics in Global Economies.

Our Procurement team has three CIPS members, including a Master (**MCIPS**) and Fellow (**FCIPS**), who is also the Chair of the South Australian branch of CIPs.

In addition, in FY'25 FPH has maintained its active status as a signatory to the UN Global Compact, affirming its support of the 10 Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In the reporting period, FPH submitted its third annual Communication on Progress (**CoP**) to the UN Global Compact, and restated our commitment to the Global Compact and its principles.

Looking ahead

In our next reporting period, the Group plans to progress the following actions to assess and address the risk of modern slavery practices in our operations and supply chain.

Assess & Identify

- Leveraging our enhanced vendor onboarding approach to identify opportunities to further refine our supply chain risk assessment.

Action

- Continuing to explore options for delivering supplier modern slavery awareness training via contractor management system.
- Collaborating with our Tier 1 suppliers and industry peers regarding modern slavery compliance supply chain activities and industry best practice.
- Progressing our current Modern Slavery 3 Year Action Plan and developing the plan for the following 3 years.

Review

- Updating our modern slavery response plan.
- Reviewing our training program.
- Reviewing and refreshing our sustainability plan.

Report

- Drafting our next Modern Slavery Statement.

This Statement is made by Flinders Port Holdings Pty Ltd, Flinders Ports Pty Ltd, and Flinders Adelaide Container Terminal Pty Ltd for the financial year ending 30 June 2025.

This Statement was approved by the Flinders Port Holdings Pty Ltd’s Board of Directors, being the Board of Directors of the parent company of both Flinders Ports Pty Ltd and Flinders Adelaide Container Terminal Pty Ltd, in its capacity as the principal governing body of all three reporting entities, on 20 November 2025.



Stewart Lammin Chief Executive Officer, Flinders Port Holdings

Date: 20 November 2025

This Statement was prepared to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed within the Statement.

MODERN SLAVERY ACT CRITERIA		FPH MODERN SLAVERY STATEMENT	PAGE
1	Identify reporting entity	About this Statement and Appendix A	3, 18
2	Describe the reporting entity’s structure, operations and supply chains	Our structure, operations and supply chain	4
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Identifying the risks of modern slavery practices	8
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	Identifying the risks of modern slavery practices	8
		Our actions to assess and address modern slavery risks	11
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing the effectiveness of our actions	11
6	Describe the process of consultation with any entities the reporting entity owns or controls	Consultation within the Group	14
7	Any other relevant information	Continuous improvement	15
		Looking ahead	16

Appendix A

Flinders Port Holdings Pty Ltd (**Flinders Ports Holdings**) subsidiary companies (together, **the Group**) in the reporting period (FY'25):

- Flinders Ports Pty Ltd
- Flinders Ports Adelaide Container Terminal Pty Ltd
- Flinders Adelaide Container Terminal Pty Ltd
- Flinders Ports Land Development Pty Ltd
- Flinders Logistics Pty Ltd*
- Flinders Warehousing and Distribution Pty Ltd
- Flinders Port Management Services Pty Ltd
- Flinders Spencer Gulf Ports Pty Ltd
- Adelaide Container Terminal Pty Ltd
- Spencer Gulf Portlink Pty Ltd
- Flinders Spencer Gulf Marine Service Pty Ltd
- Pirie Bulk Pty Ltd**

*, ** Note the divestment of Flinders Logistics Pty Ltd and Pirie Bulk Pty Ltd by FPH was completed on 6 December 2024, during the reporting period.





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Flinders Port Holdings acknowledges the Traditional Owners of the land and waterways on which we operate, and pays respect to Elders past, present and emerging.