



# MODERN SLAVERY STATEMENT

Financial Year 2019/2020

## OUR STRUCTURE

Tasmanian Ports Corporation Pty Ltd (ACN 114 161 938) (TasPorts) was established pursuant to the Tasmanian Ports Corporation Act 2005 and is wholly owned by the Tasmanian Government. TasPorts is a large proprietary company, responsible for eleven Tasmanian ports and the Devonport Airport. Over 99% of Tasmania's freight transits through these ports each year.

TasPorts' registered office is 90 Willis Street, Launceston in Tasmania 7250. TasPorts, Devonport Cradle Coast Airport and Capital Quarantine Services are business names registered to TasPorts.

TasPorts' wholly owned subsidiary company, Bass Island Line Pty Ltd (ACN 617 438 847) (BIL), operates the King Island shipping service. Bass Island Line is a registered business name of BIL.

King Island Ports Corporation Proprietary Limited (ACN 078 720 153) (KIP) is a wholly owned subsidiary of TasPorts. KIP's registered office is located at 285 Grassy Harbour Road, Grassy. KIP owns land at King Island but is otherwise a non-operating entity.

A single consolidated description of TasPorts', BIL's and KIP's actions to address modern slavery risks has been prepared on the basis that:

- TasPorts' employees manage the operations of BIL and KIP;
- TasPorts' policies and procedures also apply to BIL and KIP;
- TasPorts' Board of directors is the same as BIL's Board;
- TasPorts' Chief Executive Officer and Chief Financial Officer are the directors of KIP and the TasPorts' General Counsel/Company Secretary is also KIP's Company Secretary.

Accordingly, references in this statement to TasPorts include a reference to all of TasPorts' subsidiaries.

Through a joint venture with Qube Ports at the Port of Hobart, Southern Export Terminals Pty Ltd (ACN 616 370 775) (SET), operates a log export terminal. TasPorts does not control SET and SET does not need to prepare its own statement. However, TasPorts has reported on SET's operations and supply chains in this statement.

Consistent with TasPorts values of Care, Together and Share, TasPorts has a strong commitment to social responsibility. In formulating and delivering our business strategy we take into account our responsibility to the community, environment, our people, clients, suppliers and contractors. This statement describes the actions by TasPorts to address modern slavery risks in our operations and supply chains during the financial year ending 30 June 2020.

# OUR OPERATIONS AND SUPPLY CHAINS



## OUR OPERATIONS

TasPorts is a vertically integrated organisation, providing a diverse range of operations and services around Tasmania. These include:

- provision and maintenance of essential port infrastructure, including berths, channels, wharves and landside assets;
- delivery of vital marine services around Tasmania, including pilotage, towage and vessel traffic services;
- supply of floating plant and equipment for marine engineering projects, construction and coastal haulage;
- provision of slipway and refuelling facilities;
- maintenance of community-use waterfront assets at Sullivans Cove, Stanley, Inspection Head and Strahan, and on King and Flinders Islands;
- ownership and operation of the Devonport Airport;
- ownership and operation of the Burnie Chip Export Terminal;
- leasing portfolio of land across the various ports and airport to a variety of tenants for various uses such as stevedoring, port related operations, community events etc.

### BIL

Through BIL, we operate the King Island shipping service between Victoria, Grassy on King Island and mainland Tasmania using our vessel the John Duigan. BIL started operating in April 2017 and caters for containerised, bulk and vehicular cargo and livestock.

### SET

Through a joint venture with Qube Ports at the Port of Hobart, we operate SET, for log exports. SET commenced operating in January 2017. TasPorts' main contribution to the joint venture is the provision of land, administrative services and port infrastructure.

## OUR SUPPLY CHAINS

The main types of goods and services TasPorts procures fall within the following categories:

- Infrastructure Projects: design and engineering services, project management, construction.
- Repair and Maintenance of Infrastructure and Assets: vehicle maintenance, vessel repair and maintenance, wharf and infrastructure repair and maintenance, parts relating to maintaining, repairing and overhauling TasPorts' assets.
- Utilities: supply of electricity, gas, water, and fuel and removal of waste.
- Business Services: business consultancy, IT equipment and software services, legal services, security services (berthing cruise ships, airport), cleaning services.
- Labour Hire: for Burnie Chip Export Terminal and operations crew.
- Port Equipment: marine equipment and PPE.
- Insurance.

As at 4 June 2020 TasPorts had just over 300 employees, with 240 of these employees being full time.

### SET

SET has only a few suppliers, as most supplies are incurred by the relevant joint venture parties, to which the costs relate. As such, most are captured by TasPorts' supply chain analysis.

## MODERN SLAVERY RISKS

### EMPLOYMENT

TasPorts' senior management oversees all employment contracting which is conducted in accordance with all laws and awards. All employees' terms and conditions of employment are governed either by a contract of employment or an industrial instrument and are all paid above minimum wage.

TasPorts has an employee Code of Conduct that provides a framework for making decisions and engaging in behaviours that are ethical and appropriate. TasPorts' Whistleblowing Policy and Public Interest Disclosure Policy and Procedures aim to encourage employees to report wrongdoings by TasPorts by protecting those who make a disclosure from detrimental action.

Through its due diligence process TasPorts has identified that it does not have supervision of third party workforce terms and conditions of employment and as such has noted this issue for review and improvement in future reporting years. Despite the labour hire risk, TasPorts considers its risk of modern slavery practices within its workforce as low, as most of TasPorts' labour hire involves Tasmanian based skilled labour, which reduces the risk of modern slavery in this area.

### PROVISION AND DELIVERY OF SERVICES

TasPorts recognises that maritime ports are a potential entry point into Australia for trafficking of persons. However, TasPorts has comprehensive security control measures established to mitigate the risk of organised crime and criminal activities of such a nature in its ports, and maintains strong working relationships with Border Protection Agencies. TasPorts considers the occurrence of human trafficking occurring at its ports to be a low risk.

TasPorts also acknowledges that it is a known issue that crews on some vessels from other jurisdictions using a port may be forced to work in sub-standard conditions onboard vessels. TasPorts is aware of the Maritime Labour Conventions and encourages its employees to raise concerns in relation to the welfare of seafarers onboard the vessels, complaints made to them whilst onboard or whilst at the port and to report these incidents to the Australian Maritime Safety Authority (AMSA).

TasPorts runs a Port Welfare Committee which members include a number of port users and AMSA. The aim of the committee is to improve the welfare of seafarers at our ports.

TasPorts has worked closely with its port users to deal with the operational issues brought on by the COVID-19 pandemic and made clear its updated policies and procedures.

### SUPPLY CHAINS

The majority of TasPorts' suppliers are Tasmanian based and the remainder are Australian suppliers. As a result of the supply-based risk assessment that was undertaken for TasPorts of its 973 suppliers, TasPorts was able to identify aspects of its supply chains and operations as posing the highest risks in relation to modern slavery.

The vast majority of agreements with our suppliers are project specific, short-term arrangements. However, a large proportion of the agreements we enter into are with previously engaged suppliers.

TasPorts has identified the following areas of its supply chain as being at a higher risk to modern slavery practices:

- maintenance, security and cleaning service providers due to the nature of the industry and lack of oversight of the terms and conditions of employment;
- purchase of PPE, parts for infrastructure projects and IT equipment, due to the likely location of the manufacturing of these products;

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- purchase of catering due to the nature of the sourcing of supplies from the agriculture industry.

Despite these higher risk categories, TasPorts' suppliers were generally considered to be relatively low risk considering they are largely based within Australia. However, TasPorts acknowledges that some of its direct suppliers may have suppliers that source products from overseas which poses a risk of modern slavery practices and may be difficult to address. TasPorts is committed to working with our direct suppliers to identify and address this risk. It is intended that the policies and procedures we have implemented to help combat modern slavery may assist us in influencing further down our supply chain. For instance, our Supplier Code of Conduct requires our direct suppliers to encourage their suppliers to adhere to our Code of Conduct.

TasPorts worked closely with its various tenants during this reporting period to reduce the effect of the COVID-19 pandemic on their operations, by providing rental concessions that were in some cases, beyond that required by legislation.

## **BIL**

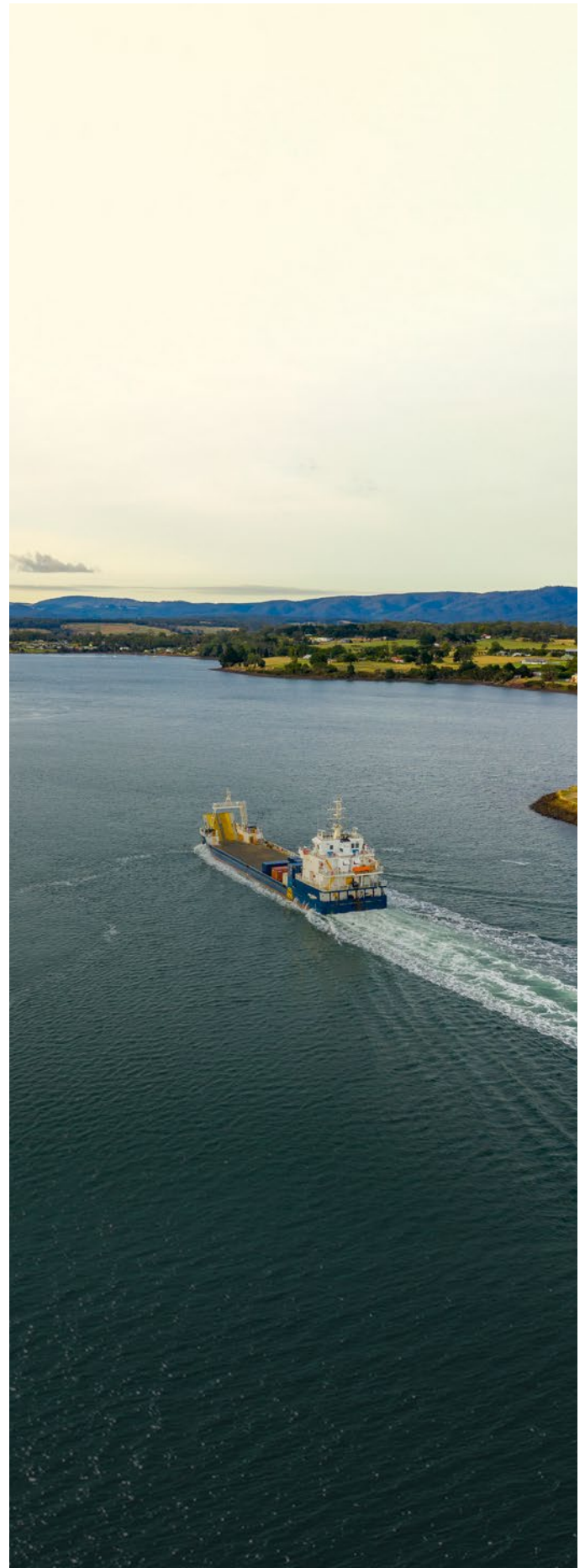
BIL's supply chains were analysed as part of TasPorts' supply chain analysis. TasPorts considers the main risks of modern slavery in BIL's operations and supply chains to be in relation to:

- the purchase of parts for its vessel, which although purchased from Australian suppliers, may be sourced from overseas;
- the operation of its vessel, which is contracted to a third party via an agreement that predates the Modern Slavery legislation. However, TasPorts proposes to issue a questionnaire to the operator to assist in determining the risk of modern slavery occurring within that entity. Further, prior to entering the agreement with the third party, TasPorts was advised that the third party's crew consisted of an all-Australian crew and was provided with details of the relevant enterprise agreements covering their employees.

## **CHARITABLE/SPONSORSHIP ACTIVITIES**

TasPorts directs its sponsorship to local organisations, community events and projects with a focus on improving marine safety, preserving and promoting the maritime history of Tasmania, contributing to the preservation of Tasmania's unique marine environments, and enabling Tasmania's ongoing social and economic prosperity.

TasPorts provides support to an organisation which has a focus on the welfare of seafarers which operates from a number of our ports. This organisation provides another level of monitoring of the treatment of seafarers that visit these ports.



# ACTIONS TO CONTROL RISKS

## ACTIONS TO CONTROL/ASSESS/ ADDRESS THESE RISKS

### ASSESSMENT OF SUPPLIERS

TasPorts' assessment of its supply chain and identification of the higher risk industries will enable TasPorts to prioritise due diligence processes in future years. TasPorts will provide questionnaires to those deemed to be its highest risk suppliers in the financial year ending 2021.

The questionnaire is designed to assess our suppliers' policies and practices on modern slavery to assist in the assessment of the likelihood of modern slavery practices occurring within particular suppliers.

If TasPorts is alerted to, or identifies a potential modern slavery risk within its operations or supply chain, it may issue a questionnaire to gain a greater insight into the suppliers operations and the policies and procedures it has in place to address modern slavery. Depending on the results of the questionnaire, or if repeated attempts to obtain answers to the questionnaire go unanswered TasPorts will consider taking steps to terminate the relationship and if necessary, raise the issue with the appropriate authorities.

### UPDATED AGREEMENTS

TasPorts has updated its various supplier contracts to include a modern slavery clause, requiring the supplier to comply with our Supplier Code of Conduct, and notes that a material breach of the Code of Conduct will be considered a material breach of the relevant agreement. Suppliers are also required to warrant that they have not been convicted of any offence involving modern slavery.

In the next few reporting years TasPorts proposes to focus on the inclusion of modern slavery clauses into relevant BIL agreements.

TasPorts proposes to negotiate the inclusion of a modern slavery clause into any future contract with its joint venture partner to mitigate the risk of modern slavery in SET's operations and supply chains.

The use of TasPorts' various ports is conditional on port users complying with TasPorts' Standard Terms and Conditions of Port Access which are available on TasPorts' website. In the next reporting period, TasPorts proposes to introduce a modern slavery clause enabling TasPorts to reject an application, or withdraw permission to access, its ports if it becomes aware of any contravention of modern slavery legislation by the owner, charterer and/or manager of the vessel unless they are able to demonstrate to TasPorts that the contravention has been remedied.

### POLICIES AND PROCEDURES

TasPorts has introduced a Modern Slavery Policy which applies to the entire organisation (including contractors engaged and undertaking work on behalf of TasPorts). The policy aims to eradicate modern slavery risks and provide information and guidance to our employees on how to recognise and deal with modern slavery issues.

TasPorts has also implemented a Supplier Code of Conduct which prescribes a set of minimum standards for doing business with TasPorts and is available on its website at <https://www.tasports.com.au/corporate>. The Code of Conduct enables TasPorts to check compliance with the requirements of the Code of Conduct and encourages its Suppliers to implement their own binding guidelines for ethical behaviour.

TasPorts has a number of other policies and procedures which are aimed at combating wrongdoing which will also have the effect of mitigating the risks of modern slavery within its operations and supply chains including:

- Whistleblower Policy;
- Fraud and Corruption Control Policy;
- Fraud and Corruption Procedure;
- Gifts and Benefits Policy;
- Public Interest Disclosure Policy and Procedure; and
- Conflicts of Interest Policy.

TasPorts' Whistleblowing Policy provides an avenue for past and present employees or any other person to anonymously report any wrongdoings including any concerns that they may have in relation to modern slavery. All reports of modern slavery would be fully investigated.

TasPorts' policies are available on its intranet and are communicated to its employees through various workshops usually conducted face to face annually. These workshops did not proceed in the 2020 financial year due to COVID-19 restrictions.

### TRAINING

TasPorts has raised awareness within its business in relation to modern slavery by providing updates about the commencement of TasPorts' Modern Slavery Policy, Supplier Code of Conduct and the new modern slavery clauses in its various agreements. In the next few reporting years, TasPorts intends to focus on providing training to employees negotiating contracts and those working portside who may be able to identify risks of modern slavery from visiting vessels.



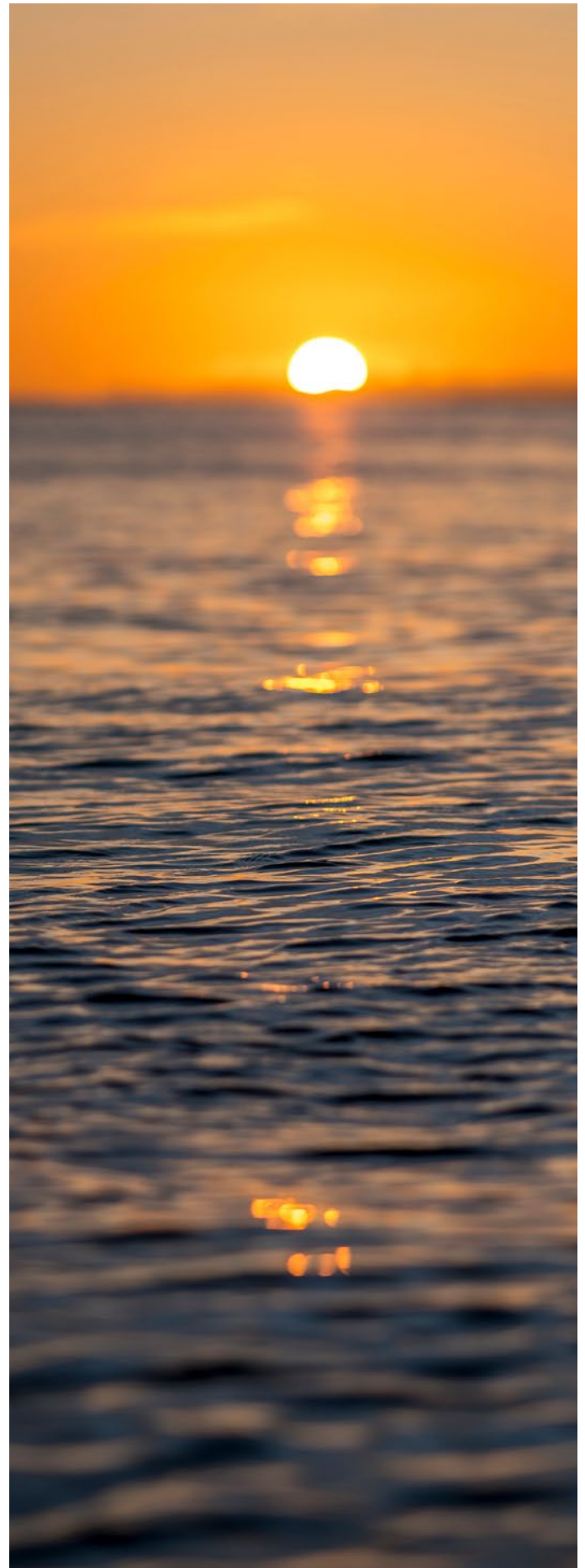
## EFFECTIVENESS OF ACTIONS

TasPorts' Board has overall responsibility for ensuring that all those under its control comply with its Modern Slavery Policy.

The General Counsel/Company Secretary has primary and day-to-day responsibility for implementing TasPorts' Modern Slavery Policy, and for monitoring its use and effectiveness. The policy, and TasPorts' internal control systems and procedures, will be subject to regular reviews to provide assurance that they are effective in countering modern slavery.

TasPorts' internal Audit Risk Management Committee (ARMCo) approves and reviews TasPorts' policies. In future reporting periods, TasPorts' Executive Leadership Team and Divisional Leadership Team will review the effectiveness of the policies and procedures implemented annually.

As TasPorts is proposing to embark on a series of staff training workshops over the future reporting periods, TasPorts proposes to issue a questionnaire to these staff at least 3 months after the completion of the sessions to ensure that staff understood the training and have retained the information. The results of these questions may provide direction for further training to ensure the training provided is effective. These future workshops will also be used as an opportunity to gain insights from employees as to whether they believe that the policies and procedures are working to combat modern slavery in our operations and supply chains and to identify any risks that have not been addressed.



## PROCESS OF CONSULTATION

Senior management from BIL, KIP and TasPorts were consulted in the preparation of this statement and the Company Secretary of each of TasPorts' subsidiaries is aware of the content of this Modern Slavery Statement.

This statement has been approved by the Board of BIL and KIP and was endorsed by the Board of TasPorts on 18 March 2021.



**Stephen Bradford**

Chairman

