



Modern Slavery Statement

YEAR ENDED 30 JUNE 2023



Introduction

Port of Brisbane has zero tolerance for any form of modern slavery or human trafficking in its operations and supply chains. Port of Brisbane supports the objectives of the *Modern Slavery Act 2018* (Cth) and is committed to tackling the risks of modern slavery in our business and our supply chains.

Port of Brisbane recognises that modern slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. Port of Brisbane recognises the importance of assessing and addressing modern slavery risks and is committed to improving responsible business practices.

Criteria One: Reporting entity

This Modern Slavery Statement is made on a joint basis by:

1. Port of Brisbane Pty Ltd
2. APH Top Co Pty Ltd
3. QPH Finance Co Pty Limited
4. QPH Property Co Pty Limited as trustee for the QPH Property Trust
5. QPH Hold Co 2 Pty Limited as trustee for the QPH Hold Trust
6. QPH Hold Co Pty Ltd
7. QPH Port Acquisition Co Pty Ltd,

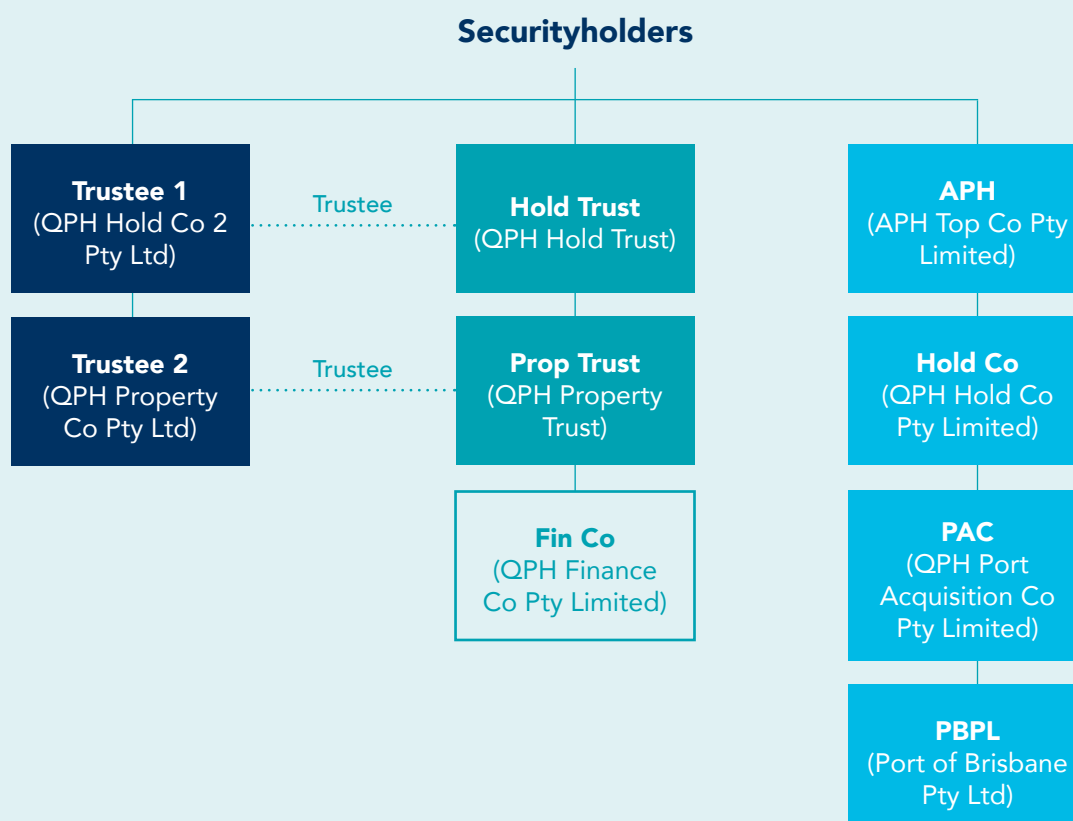
together, (the "Port of Brisbane"), in accordance with our obligations under the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement is in respect of the 12-month reporting period from 1 July 2022 to 30 June 2023. The companies and trusts above are all part of the same stapled group, each company has the same Board of Directors and they follow the same policies and procedures. APH Top Co Pty Ltd, QPH Hold Co Pty Ltd and QPH Port Acquisition Co Pty Ltd are voluntarily reporting as these entities do not meet the required financial threshold.

Criteria Two: Our structure, operations and supply chain

Structure

A structure chart showing the Port of Brisbane group entities is set out below.



Operations

As Queensland's premier port and logistics hub, Port of Brisbane facilitates economic and trade growth for the state. It is the third largest and one of the most diverse multi-cargo ports in the country, providing critical export and import links to world markets. On average, approximately \$55 billion in international trade is handled annually through the Port of Brisbane, which includes around 50% of Queensland's agricultural exports and 95% of its motor vehicles and containers. Port of Brisbane also operates the Brisbane International Cruise Terminal, a world-class cruise facility that opened in June 2022 and supports Brisbane and Queensland's cruise tourism industry.

Port of Brisbane is the Port Manager of the Port of Brisbane under 99-year leases from the Queensland Government. Port of Brisbane is owned by the APH consortium, comprising four of the world's largest and most experienced infrastructure investors:

- QIC Private Capital Pty Ltd (on behalf of its managed funds and clients)
- IFM Investors
- Caisse de dépôt et placement du Québec
- Platinum Tawreed Investments A 2010 RSC Limited (a wholly-owned subsidiary of the Abu Dhabi Investment Authority).

The services and operations provided by Port of Brisbane are summarised in the diagram opposite.

Port of Brisbane leases and manages Brisbane core port land for port-related purposes, including the provision of key core port infrastructure, to support and facilitate the flow of trade through the Port.

The development of this land is managed in accordance with the development codes of the Brisbane Port Land Use Plan 2020 and the assessment protocols defined in the *Transport Infrastructure Act 1994* and the *Planning Act 2016*.

Supply chains

To support the delivery of Port of Brisbane's operational and strategic activities, suppliers and contractors are engaged across varying geographic markets and industries. During the reporting period, 776 direct suppliers were engaged. Of those suppliers, 97% are located in Australia, with the remaining based in Canada, Germany, France, United Kingdom, Hong Kong, Ireland, Netherlands, Singapore, New Zealand and United States of America. Port of Brisbane's major categories of procurement include construction and engineering services, vessel maintenance and refit, facilities, repairs and maintenance, technology, advisory and consultancy.

Our services and operations



Port of Brisbane Pty Ltd

Port Services	Property	Brisbane International Cruise Terminal	Other PBPL services and operations	
<ul style="list-style-type: none"> Provision of harbour and wharfage related services Operation of the Brisbane Multimodal Terminal Around 450 commodities handled through the Port Approx 1.5 million TEUs handled annually 	<ul style="list-style-type: none"> Delivery and maintenance of port infrastructure including: wharf, land, roads, warehouse developments and Future Port Expansion area Facilitate development approvals on core port land Facilities management for port tenants 546ha of leased land 139 customer leases / licences 	<ul style="list-style-type: none"> Delivery and maintenance of a public tourism infrastructure asset Provision of services including security management and facilities management Oversight of third-party contractors including cruise ship operations, car parking management and operations, security operations, café and retail operators and facilities maintenance Common user facility, open to all visiting cruise lines 	<ul style="list-style-type: none"> Hydrographic surveying, marine and dredging operations maintain navigable access for commercial shipping at the Port and provide commercial services for clients (including port authorities, local councils, and infrastructure projects) 24/7 Port Security across all PBPL precincts Operation of the Port of Brisbane MSIC (Maritime Security Identification Card) Centre as an approved issuing body Operation of Visitors Centre and Café 	<ul style="list-style-type: none"> Port operations carried out by private operators include stevedoring, towage and pilotage Vessel Traffic Services are the responsibility of the Queensland Department of Transport and Main Roads (Maritime Safety Queensland)

As at 30 June 2023



Criteria Three: Identifying the risk of modern slavery practices

Operations

As of 30 June 2023, Port of Brisbane’s workforce comprised 204 direct employees (including casuals) and 3 contractors. Half of the Port’s employees are covered by Enterprise Agreements and the other half are engaged by individual contracts. All of Port of Brisbane’s industrial instruments are underpinned by the Fair Work Act, National Employment Standards, and relevant awards. Port of Brisbane protects the health, safety, and wellbeing of its employees through robust governance including responsible recruitment, an Employee Code of Conduct, and a Whistleblower Policy.

We acknowledge there is an inherent risk of modern slavery in shipping due to the prevalence of poor working conditions and practices attributed to slavery. However, the risk of modern slavery practices within our marine operations and vessel crews is deemed low because of Port of Brisbane’s robust governance practices.

Based on Port of Brisbane’s workforce composition, industrial instruments, internal governance, and transparent grievance channels, the risk of modern slavery within our operations is deemed to be low.

Supply chain

Modern slavery risk can be dependent on several intersecting factors. Port of Brisbane has analysed its supply chain against four modern slavery risk indicators including sector and industry risk, product and service risk, geographic risk, and entity risk.

Sector and industry risk	Sectors and industries with high-risk characteristics in the production of goods or delivery of services.
Product and service risk	Goods and services linked to dangerous or sub-standard working conditions, low-skilled labour or vulnerable populations, and exploitation or underpayment.
Geographic risk	Countries with weak rule of law, limited human rights protections, conflict, and socio-economic factors (e.g. high poverty rates).
Entity risk	Entities with poor governance structures, complex sub-contracting arrangements or poor and concealed recruitment standards and practices.



Those industries, sectors, products and services within Port of Brisbane's supply chain that have a higher inherent risk of modern slavery have been identified below.

Construction

- *labour*
- *construction materials*
- *repairs and maintenance*

Commercial Services

- *cleaning*
- *landscaping services*
- *security*

Technology

- *electronics*

Food and beverage

- *raw materials*

Textiles

- *raw materials*
- *garments*

Consumables

- *office consumables*
- *branded merchandise*
- *Personal Protective Equipment*

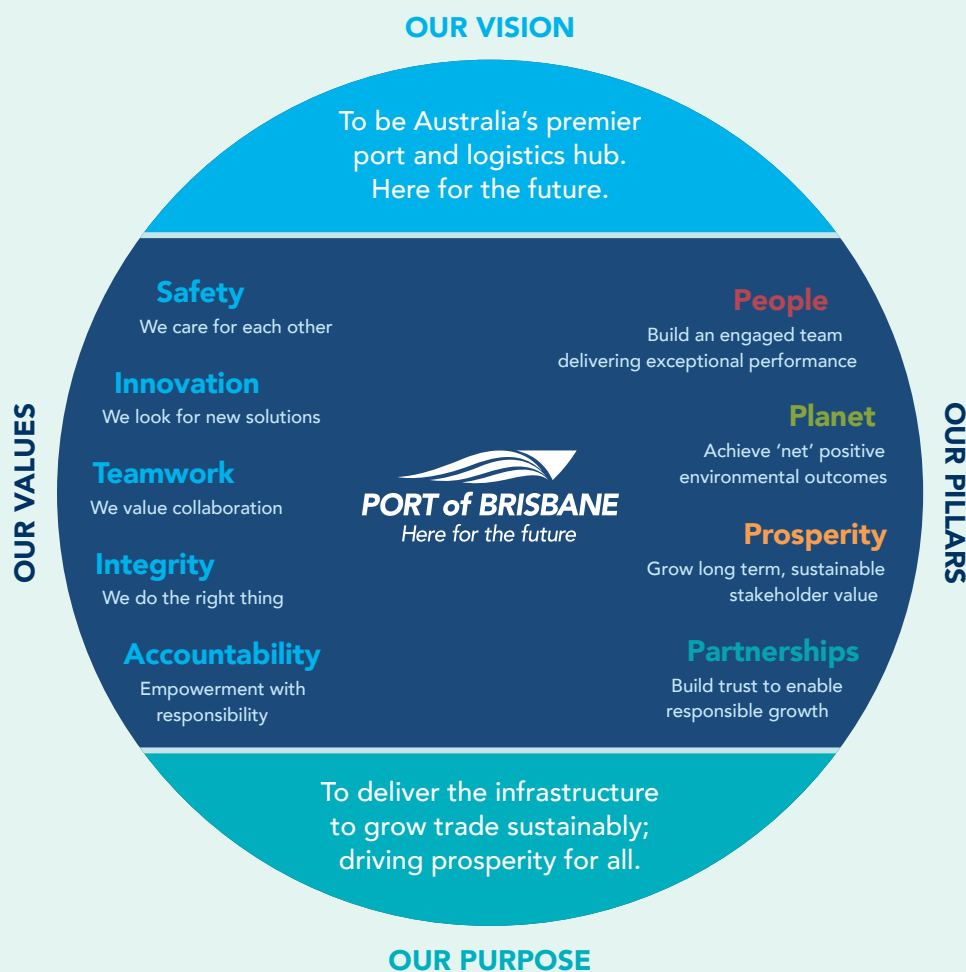
Geographically, the majority of Port of Brisbane's goods and services are procured from countries with a low inherent risk of modern slavery. While many of our major suppliers are based in Australia, some are global suppliers with extended operations and supply chains across the world. Additionally, Port of Brisbane acknowledges the risk of modern slavery posed by suppliers with poor governance structures and its possible prevalence in our supply chain, including third-party labour hire. Port of Brisbane endeavours to enhance our supplier assessment and monitoring capabilities to capture risks levels beyond tier one suppliers.

Port of Brisbane acknowledges the ongoing risk of modern slavery in the maritime industry to seafarers. Although our level of control has been identified as low, we intend to work with stakeholders to positively address any identified issues and raise awareness on risk indicators.

Criteria Four: Actions to assess and address modern slavery risks

Port of Brisbane’s strategic framework is underpinned by refreshed Vision, Values and Purpose and, importantly, puts our Sustainability Program at its core.

The “Four Ps – People, Partnerships, Prosperity and Planet” – are the platforms from which the Port plans and conducts its business every day. Key strategic and operational initiatives underpin these four focus areas, including a focus on social responsibility and anti-slavery practices. Port of Brisbane’s sustainability achievements are outlined in its [2022/23 Sustainability Report](#).



Governance

Port of Brisbane has in place policies and a risk management framework to identify, assess, mitigate, and monitor potential risk areas where it could be exposed to modern slavery concerns. Port of Brisbane’s Risk Management Framework aligns the Risk Management Standard to the international standard ISO 31000:2018. The risk management framework continues to provide a range of tools to manage strategic and operational (business unit-specific) risk and ensures employees receive relevant training as required.

Port of Brisbane has developed a Supplier Risk Assessment Questionnaire. This questionnaire will help identify the maturity of direct suppliers in relation to anti-slavery practices and better inform Port of Brisbane’s relationship with them.



Modern Slavery Steering Committee

Following a review of the initiatives delivered in financial year 2022, Port of Brisbane’s Modern Slavery Steering Committee updated its charter and continued to progress initiatives in the 2023 financial year. The Steering Committee comprises of representatives from across the business with overarching endorsement from the Executive Leadership Team, Audit and Risk Committee and Board. The Steering Committee members from Legal, Risk, Procurement, Finance, People and Performance, Facilities, Corporate Relations and Sustainability teams engage to:

- develop and drive initiatives to help Port of Brisbane reduce the risk of modern slavery
- ensure a whole of business, consistent approach
- leverage experts from business units within Port of Brisbane to provide advice, influence and create awareness
- review and monitor progress and effectiveness of actions.

Internal Governance Structure



Policies

Port of Brisbane continues to monitor its existing policies and procedures against the requirements of the Modern Slavery Act. In this Reporting Period, its Sustainability Policy was reviewed.

Contractual Agreements

In the reporting period, Port of Brisbane undertook further review of its suite of precedent contracts. Port of Brisbane's works and supply contracts include a modern slavery provision which requires suppliers to comply with applicable modern slavery laws and to provide information on how that supplier is managing modern slavery compliance, if requested.

Contractor Guidelines

Port of Brisbane's Contractor Guidelines inform its suppliers and contractors of Port of Brisbane's sites, requirements, and present hazards and risks. During the reporting period, the guidelines were updated to include Port of Brisbane's approach to preventing modern slavery. Port of Brisbane's Contractor Guidelines are provided to suppliers and contractors on contract award and are also publicly available on its [website](#).

ERP Transformation Project

The Enterprise Resource Planning (ERP) project is a multi-year business-wide project focusing on optimising and redesigning specific financial and procurement processes to align with industry best practice. This work will help create a platform as the business works towards its 2030 sustainable procurement goal of aligning with ISO 20400, as well as support reporting enhancements on its supply base.

Communication

During the Reporting Period, Port of Brisbane shared information on its Modern Slavery Statement and its anti-slavery initiatives with employees and the broader community. Port of Brisbane's financial year 2022 Modern Slavery Statement was shared with its employees in an 'all employee' communication channel, Team Brief, as well as the port community via the [February 2023 Port News](#) email newsletter reaching tenants, stevedores, and shipping agents.

Training

During the reporting period, a refreshed modern slavery and human trafficking training module was released to employees. The new training module includes information on the presence of modern slavery in the global community, legislative obligations, risk factors, actions to combat it, as well as information and questions specific to Port of Brisbane. All employees are to complete the modern slavery training module every 12 months.

Case Study

During the reporting period, Port of Brisbane tendered an extensive contract for security services. Security services are vital to the safe and secure operation of the port. However, it is an industry identified as having a higher inherent risk of modern slavery.

The procurement process gave an opportunity to assess supplier risk with a questionnaire, as well as establish expectations and contractual obligations in relation to modern slavery practices. In total, 100% of tenderers completed the assessment questionnaire, with demonstrated risk mitigation practices and procedures.



Collaboration

Port of Brisbane is committed to advocating awareness of modern slavery within its community and sphere of influence. Learnings were shared with Port of Brisbane securityholders and their associated businesses.

Port of Brisbane has an existing relationship with Mission to Seafarers, underpinned by a Memorandum of Understanding. Mission to Seafarers offers shore-based practical and emotional support to seafarers, as they undertake their essential and, oftentimes, dangerous work. Port of Brisbane provides Mission to Seafarers with a shore-based welfare centre at the Port of Brisbane to deliver services and provides other funding opportunities. Additionally, the half-yearly Port Welfare Committee is attended by a Port of Brisbane representative. Port of Brisbane recognises the importance of Mission to Seafarers on improving seafarer welfare within the shipping industry and will continue to foster and develop this relationship.

Criteria Five: Effectiveness of actions

With support from the Steering Committee, each year Port of Brisbane reflects on the progress made and actions for the following year. Assessing the effectiveness of Port of Brisbane's actions will over time contribute to the improvement of social practices within the business as well as globally.

In the reporting period, the following key initiatives were progressed:

- review of the Modern Slavery Steering Committee Charter and continued progress on initiatives
- review of Port of Brisbane's Sustainability Policy in November 2022
- anti-slavery clauses continued to be incorporated in new and precedent contracts
- updated Port of Brisbane's Contractor Guidelines to inform suppliers and contractors of the approach and expectations to mitigating modern slavery risk
- initiation of an ERP Transformation Project to establish a platform to better support the core business strategy and commitments
- shared Port of Brisbane's financial year 2022 Modern Slavery Statement and associated initiatives with all employees and the port community to raise awareness
- released Port of Brisbane's refreshed modern slavery training module to new and existing employees with a completion rate of 87%
- updated the employee compliance training matrix to require modern slavery training be undertaken on an annual basis
- collaborated with securityholders and Mission to Seafarers to share learnings.

Criteria Six: Consultation

This statement has been prepared in a collaborative manner and in consultation with each of the entities covered by this joint statement (as listed in Criteria One). Each of these entities has a common Board of Directors that mutually understand and recognise the importance of mitigating modern slavery risks, as well as supports the function of Port of Brisbane's Modern Slavery Steering Committee. The Steering Committee drives cross-functional engagement, delivery and consistency in our approach to combatting modern slavery.



Approval

This statement has been approved by the Board of Directors of each of Port of Brisbane Pty Ltd, APH Top Co Pty Ltd, QPH Hold Co Pty Ltd, QPH Port Acquisition Co Pty Ltd, QPH Finance Co Pty Limited, QPH Property Co Pty Limited as trustee for the QPH Property Trust and QPH Hold Co 2 Pty Limited as trustee for the QPH Hold Trust.

Guy Michael Cowan

Chairman

17 November 2023

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