



# 2024 MODERN SLAVERY STATEMENT

2023 REPORTING YEAR

# MORE THAN A PORT

Australia's Deepwater  
Global Gateway

## Contents

<b>1. INTRODUCTION</b>	<b>4</b>
1.1 A message from our CEO	5
1.2 Our values	6
1.3 Our statement	9
<b>2. REPORTING ENTITIES</b>	<b>10</b>
2.1 Reporting entities	11
2.2 Our structure	13
<b>3. OPERATIONS AND SUPPLY CHAINS</b>	<b>14</b>
3.1 About us	15
3.2 Key functions	17
<b>4. RISKS IN OUR SUPPLY CHAINS</b>	<b>18</b>
4.1 Risk assessment methodology	19
4.2 2023 supplier audit	20
4.2.1 Overall risk ratings	20
4.2.2 Geographic risk	20
4.2.3 Industry risk	21
4.3 Credit card spending audit	21
<b>5. OUR ACTIONS</b>	<b>22</b>
5.1 Seafarer support	23
5.1.1 Vulnerability	23
5.1.2 General support	23
5.1.3 Mission to seafarers	24
5.2 Change in risk assessment platform	25
5.3 Sustainability linked loans	26
5.4 Stakeholder engagement	26
5.5 Modern slavery taskforce	27
5.6 Staff training	27
<b>6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS</b>	<b>28</b>
<b>7. CONSULTATION PROCESS</b>	<b>29</b>
<b>8. OUR GOALS FOR 2024</b>	<b>30</b>
<b>STATEMENT ANNEXURE</b>	<b>31</b>

# 1. INTRODUCTION

## 1.1 A MESSAGE

### FROM OUR CEO

**Craig Carmody**  
CEO



Port of Newcastle is taking a leadership role in maritime as an active participant to end modern slavery through our systems and processes, along with our stakeholder partnerships, internally and across the supply chain.

As an organisation committed to continuous improvement, in 2023 our Modern Slavery Taskforce strengthened our systems and processes, along with upskilling staff and supporting key stakeholders, which included:

- Updating our supplier screening software to Fair Supply, a cloud based ESG risk management tool, who screen our suppliers and up to ten tiers along the value chain to assess for modern slavery risks. This helps to minimise the risk of exposure to modern slavery within our value chain
- Continued to provide staff training on Modern Slavery to ensure staff are aware of danger signs and what to look out for
- Continued support of seafarers and Mission to Seafarers

As a global trade organisation, we are acutely aware of our responsibilities in managing and mitigating the risks related to modern slavery and other human rights risks.

With the commitment and ongoing support of our Board of Directors and Executive Leadership Team, we continue to undertake change that is measurable and impactful, with the aim of protecting fundamental human rights.

Our efforts continue to demonstrate positive change, change in progress and improvement across our organisation. As expectations for the management of modern slavery risks globally continues to grow, we remain committed to play our role in the global response and end modern slavery.

# 1.2 OUR VALUES

At the Port of Newcastle, our key values are **Community, Wellbeing, Integrity and Curiosity.**

We bring these values into our approach to managing **Modern Slavery risks across our business.**



**COMMUNITY:** We engage with our employees, contractors, suppliers and community members to work together to identify and combat modern slavery;



**WELLBEING:** We continue to invest in the wellbeing of seafarers, who are at higher risk of modern slavery, than many other port user groups;



**INTEGRITY:** We make it clear in our codes of conduct, contracts and policies that we do not tolerate any form of slavery or human rights abuses in our business or our supply chains;



**CURIOSITY:** We provide training and encouraging our people to be curious, ask questions and seek better ways to do business.





## 1.3 OUR STATEMENT

**This is the fourth Modern Slavery Statement produced by the Port of Newcastle in compliance with the Modern Slavery Act 2018 (Cth).**

This statement sets out:

1. Details about our reporting entities;
2. Details about modern slavery risks in our operations and supply chains in 2023;
3. Actions taken to identify and address modern slavery risks in our operations and supply chains in 2023;
4. How we are monitoring the effectiveness of our actions; and
5. Our strategy to further improve our performance in 2024.

# 2. REPORTING ENTITIES

## 2.1 REPORTING ENTITIES

This statement is a joint Modern Slavery Statement made by and on behalf of the following entities under the Modern Slavery Act 2018 (Cth) for the reporting period of 1 January 2023 – 31 December 2023:

1. The Port of Newcastle Investments (Holding) Trust (ABN 84 685 817 245);
2. Port of Newcastle Unit Trust (ABN 97 539 122 070); and
3. Port of Newcastle Investments Pty Limited (ACN 169 132 441).

In this Statement these three reporting entities will be referred to collectively as the **Port of Newcastle** or **PON**.





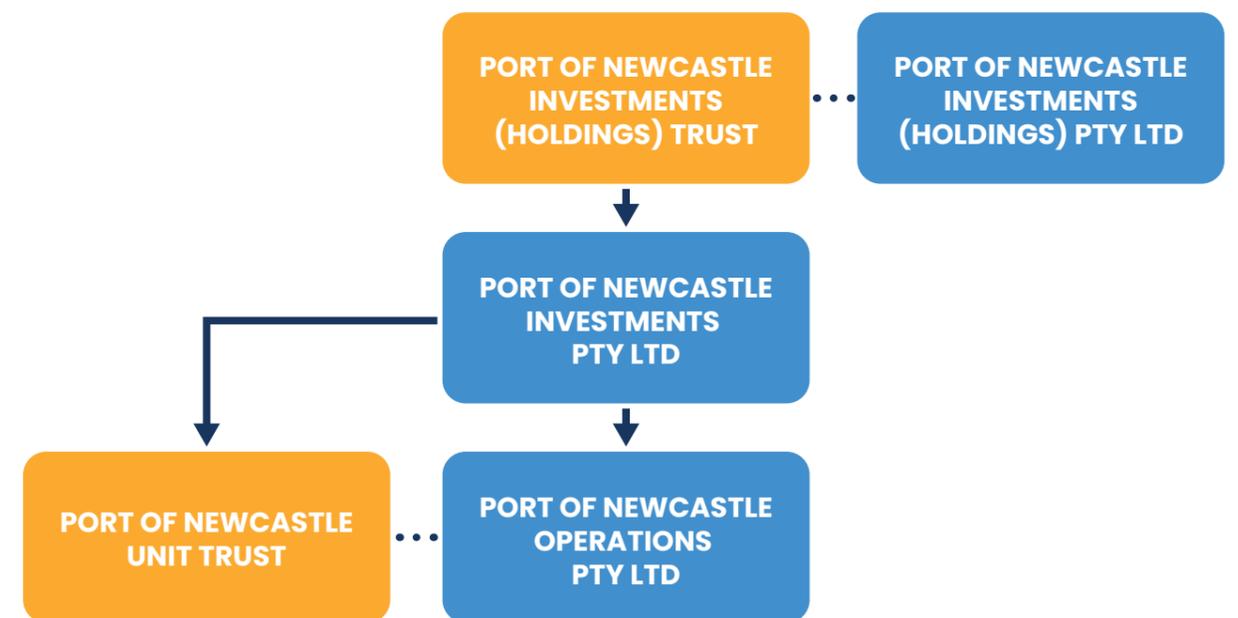
## 2.2 OUR STRUCTURE

**Port of Newcastle Investments (Holdings) Pty Limited** is a proprietary limited company and is trustee for the Port of Newcastle Investments (Holdings) Trust, with two shareholders being The Infrastructure Fund and China Merchant Ports.

**Port of Newcastle Investments Pty Limited** is 100 % wholly owned subsidiary of Port of Newcastle Investments (Holdings) Pty Ltd and headquarters in Newcastle, New South Wales.

**Port of Newcastle Operations Pty Limited** is a 100% owned subsidiary of Port of Newcastle Investments Pty Limited, and is the trustee for the Port of Newcastle Unit Trust. Port of Newcastle Investments Pty Limited does not have any other subsidiaries. As at 31 December 2023, Port of Newcastle Operations Pty Limited Pty Limited employed 132 people in Australia.

**The Port of Newcastle Investments (Holding) Trust** and the **Port of Newcastle Unit Trust** are trusts.



# 3. OPERATIONS AND SUPPLY CHAINS

## 3.1 ABOUT US

Port of Newcastle is Australia's deepwater global gateway.

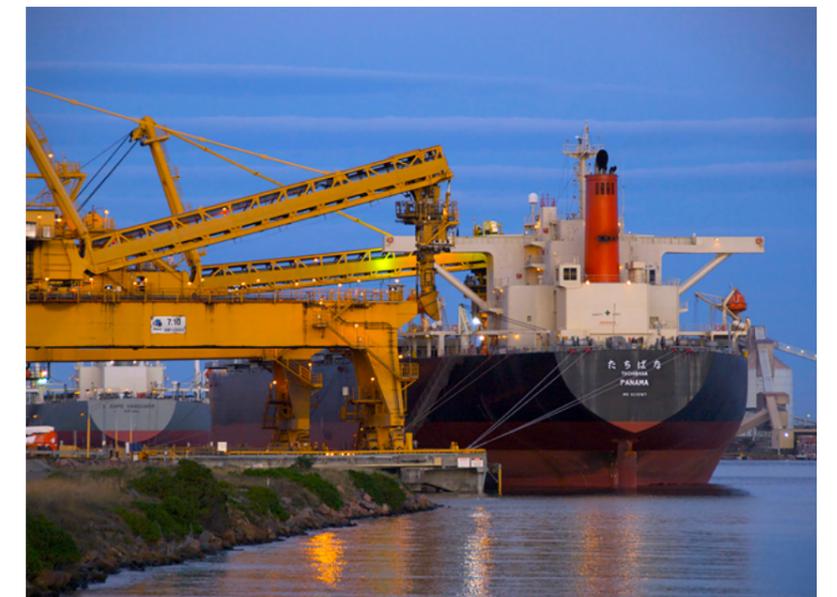
Port of Newcastle is more than a port. It exists to build Australia's prosperity with responsible, integrated and innovative supply chain solutions.

With trade worth around **\$48 billion** to the national economy each year, Port of Newcastle enables Australian businesses to successfully compete in international markets.

The port currently handles 4,697 ship movements and 166 million tones of cargo annually. With a deepwater shipping channel operating at 50% of its capacity, significant port land available and enviable access to national rail and road infrastructure, Port of Newcastle is positioned to further underpin the future prosperity of the Hunter, NSW and Australia.

As custodians of the region's critical asset, Port of Newcastle is diversifying its trade as it strives to create a safe, sustainable and environmentally and socially responsible future.

Our vision is to build Australia's prosperity with responsible, integrated and innovative supply chain solutions





## 3.2 KEY FUNCTIONS

Key functions within our business include:



Trade and Port Development



Management of 780 Hectares of Port



Wharf and Berth Services



Maintenance of Major Port Assets



Vessel Scheduling



Legal, Planning and Environment



Dredging and Survey Services



Finance



Community and Stakeholder Relations

# 4. RISKS IN OUR SUPPLY CHAINS

## 4.1 RISK

## ASSESSMENT

## METHODOLOGY

During the reporting period, PON changed from the Informed365 platform to the Fair Supply Modern Slavery platform to facilitate the analysis of our supply chains and assessment of the associated modern slavery risks.

Fair Supply provides overall risk ratings for PON's suppliers by analysing up to ten tiers of each suppliers value chain. These ratings are generated from a weighted combination of geographic and industry-based risks. These overall weighted ratings are known as adjusted risk ratings.



## 4.2 2023

# SUPPLIER AUDIT

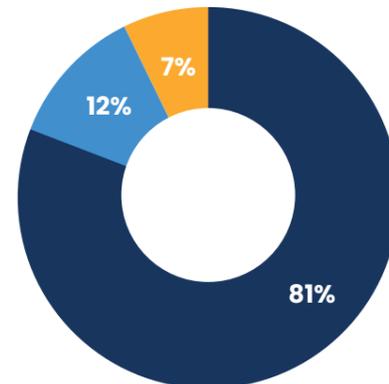
**During the reporting year, PON had access to modern slavery adjusted risk ratings for 118 suppliers.**

**A breakdown of key risks is outlined below.**

### 4.2.1 OVERALL RISK RATINGS

The overall risk ratings shown below are generally lower than the ratings generated from PON's 2022 supplier audit.

Overall Risk Ratings	Percentage of Port Of Newcastle Suppliers
● Low	81%
● Moderate – Low	12%
● Moderate	7%
● High	0
● V High	0



### 4.2.2 GEOGRAPHIC RISK

95% of PON's suppliers are companies incorporated in Australia. The remaining 5% of suppliers reviewed, were headquartered across 4 countries including USA, Canada, Denmark, Singapore and China.

The majority of these suppliers had a 'low' geographic risk rating

### 4.2.3 INDUSTRY RISK

Fair Supply analyse data across ten tiers of each supply chain to further understand the modern slavery across the whole value chain.

During the 2023 calendar year only nine suppliers (7%) were found to have a moderate level of modern slavery risk and were sent a follow up questionnaire to determine the overall risk. The moderate risk was assigned based on the ten tiers within each supply chain, with the main risks identified in the textile and maritime industry.

These industries are closely linked to marine transport and clothing (manufacture and recycle) activities, which are important to port operations. PON is aware of the modern slavery risks in these industries and seeks to proactively engage with suppliers to mitigate known risks, and to seek to procure goods and services from lower risk suppliers.

## 4.3 CREDIT CARD SPENDING AUDIT

**During 2023, our risk manager analysed the modern slavery risks within the suppliers from the corporate credit card spend.**

The majority of high risk spend was in the entertainment industry; however, as the majority of this spend occurred in Australia, the overall risk rating was considered low due to the Australian labour laws.

We aim to provide additional training to employees that have corporate credit cards during 2024, to ensure they are aware of the modern slavery risks and make informed decisions when purchasing goods.

# 5. OUR ACTIONS

**In addition to conducting the supplier audit discussed above, PON undertook the following actions during the reporting period to address modern slavery risks associated with our operations and supply chains:**

1. Continuing to support seafarers within the Port of Newcastle;
2. Updating our modern slavery screening platform to provide greater insight into our supply chain;
3. Ongoing compliance with modern slavery KPIs in sustainability linked loan arrangements;
4. Engaging with stakeholders on modern slavery issues;
5. Continuing to operate a Modern Slavery Taskforce; and
6. Embedding modern slavery training into PON's employee onboarding process.

## 5.1 SEAFARER SUPPORT

### 5.1.1 VULNERABILITIES

As noted in previous Modern Slavery Statements, PON is aware of significant modern slavery risks and challenges presented in the marine and maritime industries.

The WalkFree Global Slavery Index 2023 noted that restrictions introduced to curb the spread of COVID-19 have continued to interrupt crew rotations, reduced land access and reduced opportunities for seafarers to return to their homes. These factors combine to reduce the level of oversight of working conditions aboard vessels, which can in turn increase modern slavery risks.

While seafarers do not directly form part of PON's direct business operations, and are not suppliers to PON, they are a vulnerable group of port users.

### 5.1.2 GENERAL SUPPORT

PON understands that it is typical for seafarers to work on ships for 9 months at a time, with limited ability to access appropriate means of communication, which can leave many isolated from family, friends, and other supports.

Providing practical supports to this vulnerable group within PON's supply chains is a practical way to minimise the risks of modern slavery practices in those industries.

Our wharf officers are aware of the modern slavery risks to seafarers and are proactive in engaging with seafarers whilst carrying out their duties and raising issues if identified.

PON has continued to provide free WiFi boxes to vessels at berth. These boxes allow seafarers to access the internet in order to communicate with family and access services and information.

### 5.1.3 MISSION TO SEAFARERS

During the reporting period, PON continued to support the Mission to Seafarers Newcastle. This organisation is part of a global mission founded in 1856 operating in more than 230 ports world-wide. It operates through a network of chaplains, honorary chaplains, lay staff and helpers and provides psychological, emotional, practical and spiritual support for Seafarers and their families.

During 2023, PON provided financial and in-kind support to the Mission to Seafarers Newcastle, including:

1. Working closely with the Mission to Seafarer's (MTS) Newcastle to supply care packs to vessels on their arrival and facilitate access for MTS on common user berths;
2. Providing a grant of \$8,500 to MTS as part of the Your Port, Our Community project; and
3. Purchasing a table at the annual MTS ball and providing in-kind support for functions throughout 2023.



*The Mission to Seafarers centre is indebted to the Port of Newcastle for its direct involvement and financial support. The funds provided by PON ensure all international Seafarers have the opportunity for shore leave via a free bus service and access to a world-class Seafarers centre. The Mission also provides counselling, hospital and ship visitation as well as Seafarer wellness and psycho-social care and programmes. We are incredibly grateful for the PoN's generosity and so too are the 50,000 Seafarers they assist to have freedom whilst in our wonderful city.*

**Reverend Garry Dodd**  
Senior Chaplain | MTS Newcastle

## 5.2 CHANGE

## IN RISK

## ASSESSMENT

## PLATFORM

During the reporting period, PON changed from the Informed365 platform to the Fair Supply Modern Slavery platform to facilitate the analysis of our supply chains and assessment of the associated modern slavery risks.

The Informed365 platform focused primarily on industry specific risks and geographic risks.

The Fair Supply System used by PON during the reporting period, builds on those two key characteristics, by:

1. Carrying out further economic analysis using data from proprietary data sets as well as multiple global databases including the United Nations System of National Accounts, the Australian Bureau of Statistics, the Walk Free Foundation's Global Slavery Index and the International Labour Organisation's Global Estimates of Modern Slavery; and
2. Mapping PON's procurement spending through global markets and multiple supply chain tiers.

Fair Supply provides overall risk ratings for PON's suppliers, by analysing up to ten tiers of each suppliers' value chain. Ratings are expressed as a theoretical number of forced labourers per million dollars of procurement spend.

These figures are then aligned with one of five modern slavery risk categories: Low, Moderate Low, Moderate, Moderate High and High.

These categories are intended to assist PON in taking targeted risk mitigation and due diligence activities, in the areas of highest risk.



## 5.3 SUSTAINABILITY LINKED LOANS

In May 2021, PON entered into landmark sustainability linked loan arrangements (SLL) led by the National Australia Bank. Since 2021, PON have entered into an additional sustainability linked loan and sustainability linked hedge transaction.

Under these arrangements, the financing of the Port of Newcastle is aligned with long-term environmentally and socially responsible outcomes. This was the first sustainability-linked financing by an Australian seaport and the first such loan in Australia to set financial penalties for missing a set Modern Slavery KPI.

The Port of Newcastle has a 100% success rate in achieving the SLL Modern Slavery KPI, including during the reporting period.

## 5.4 STAKEHOLDER ENGAGEMENT

During the 2022 calendar year the Modern Slavery Taskforce developed a plan to engage with stakeholders and community members on modern slavery risks.

During the reporting period, PON staff discussed modern slavery matters and PON expectations:

1. At customer engagement meetings, Community Liaison Group, Port User Group meetings; and
2. With suppliers during tendering and contracting processes.

## 5.5 MODERN SLAVERY TASKFORCE

PON's Modern Slavery Taskforce is comprised of staff from multiple business units.

During the reporting year, the Taskforce:

1. Met to allocate responsibility of tasks and actions and prioritise tasks and actions and make recommendations to the Executive Leadership Team with respect to the development and implementation of PON's 2023 Modern Slavery Action Plan;
2. Communicated with PON staff about new Modern Slavery screening processes and researched future training options;
3. Advocated for strong action on modern slavery with internal staff and external stakeholders;
4. Assisted in the preparation of this modern slavery statement; and
5. Supported PON staff to screen suppliers for modern slavery risks.

## 5.6 STAFF TRAINING

During 2023, new starters at PON completed compulsory ESG training, which included a specific module on modern slavery and PON's obligations to identify and mitigate risks in its supply chains.

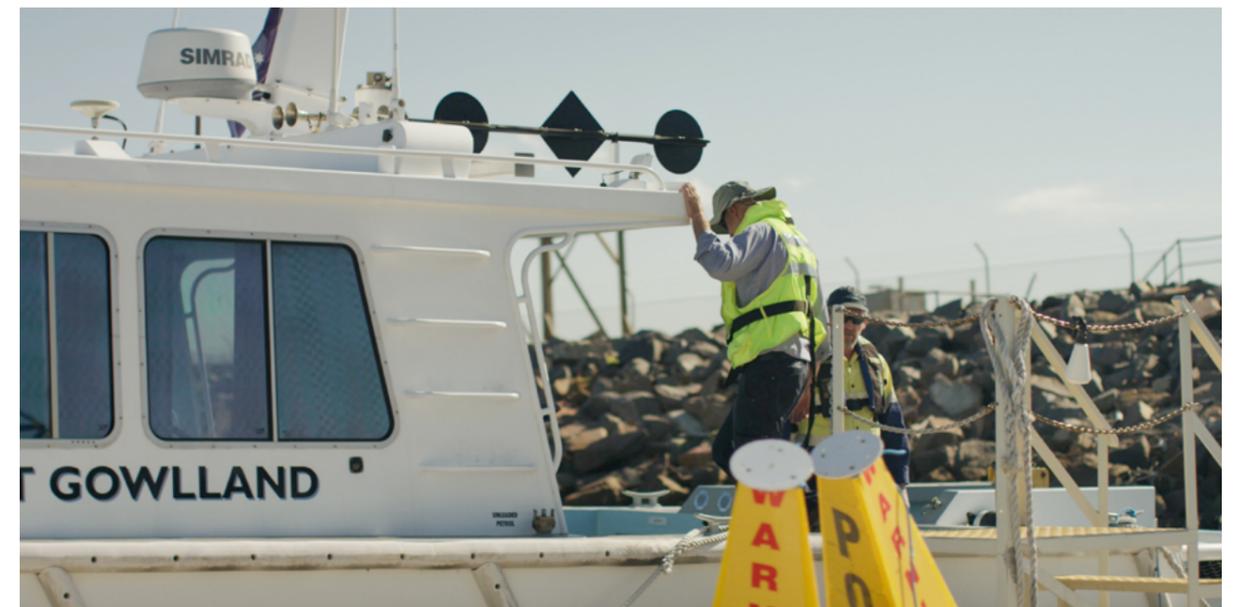
# 6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

**Port of Newcastle will continue assessing the effectiveness of the actions it is taking to identify and address the risks of modern slavery practices in its operations and supply chains in the following ways:**

1. Continuing our annual audits of credit card spending to ensure that suppliers are screened;
2. Comparing the results of our supplier audits year on year, to identify any trends or key risk areas;
3. Ensuring that our Modern Slavery Taskforce considers and reviews the need for staff training on modern slavery issues; and
4. Continuing to monitor progress against annual modern slavery action plans.

# 7. CONSULTATION PROCESS

**This Statement was prepared with input by members of our Modern Slavery Taskforce, PON's executive leadership team, and the Board responsible for each reporting entity.**



# 8. OUR GOALS FOR 2024

**PON has developed a modern slavery action plan for the 2024 calendar year.**

**Key goals in that plan include:**

1. Continually improving and automating our supplier auditing procedures and ensuring staff are trained in the new procedures;
2. Continuing to provide direct support to seafarers throughout 2024;
3. Providing staff training via a face-to-face session on Modern Slavery and the Port of Newcastle Modern Slavery Procedure;
4. Updating our Modern slavery supply chain assessment methodology; and
5. Updating our Modern Slavery procedure to simplify the process for staff and embed risk management processes into credit card spend.

## STATEMENT ANNEXURE

This Modern Slavery Statement was approved by the principal governing body of Port of Newcastle, as defined by the Modern Slavery Act 2018 (Cth) (the **Act**), on 29th June 2023.

This Modern Slavery Statement is signed by a responsible member of Port of Newcastle, as defined by the Act:



**Craig Carmody, CEO**



**Roy Green, Board Chairperson**

This statement addresses each of the mandatory criteria in section 16 of the Act as set out in the table below:

MANDATORY CRITERIA	SECTION NUMBER
Identify the reporting entity.	2
Describe the reporting entity's structure, operations and supply chains.	2 & 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.	4
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5
Describe how the reporting entity assesses the effectiveness of these actions.	6
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	7
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	1 & 8



**Headquarters:** Level 4 251 Wharf Road Newcastle NSW 2300