

FY2024

# Modern Slavery

Statement

A man with short brown hair and a beard, wearing a high-visibility orange and blue work jacket, is driving a truck through a dark tunnel. The truck's interior is visible, including the steering wheel and dashboard. The tunnel walls are dark, and there are some blue lights visible in the distance. The overall scene is dimly lit, with the primary light source being the truck's interior lights and the distant tunnel lights.

<b>01</b>	Introduction
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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**), has continued its commitment to addressing the risk of modern slavery practices in its 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 combating 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, 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.

## About this Statement

In FY24, FPH and its subsidiaries, Flinders Ports Pty Ltd (**FP**) and (in its inaugural reporting period) 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 2024 (**reporting period**). The Statement outlines the program of work that the Group has undertaken in the fifth 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 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.

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 FY24 reporting period, to assess and address the risks of modern slavery practices in the **supply chain** and **operations** of each company within the Group.

The Group had an annual turnover of \$305,500,960 in FY24 and, as at the end of the reporting period, employed 745 people.

Financial Year 2024

745

Total employees

24+  
million

Tonnes of cargo shipped through our Ports

300+  
million

Annual turnover

24k+

Jobs facilitated in South Australia by the ports industry\*

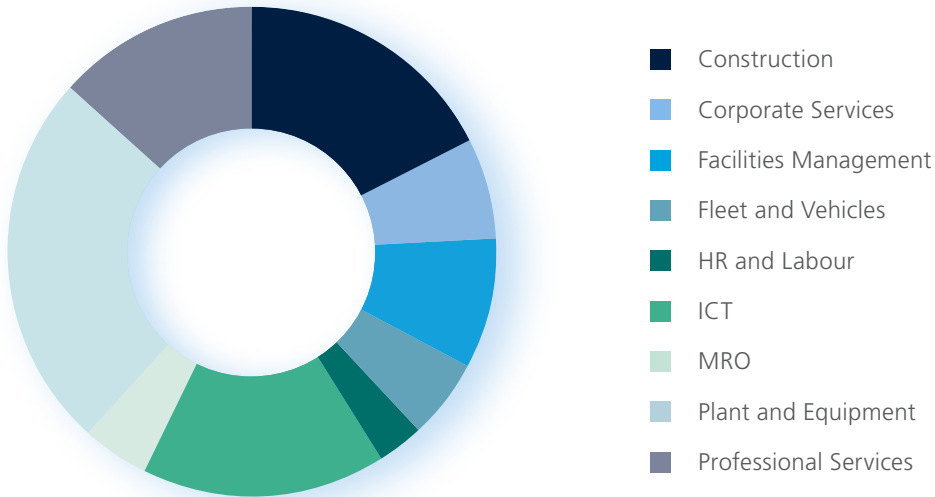
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International annual trade value delivered in South Australia by the ports industry\*

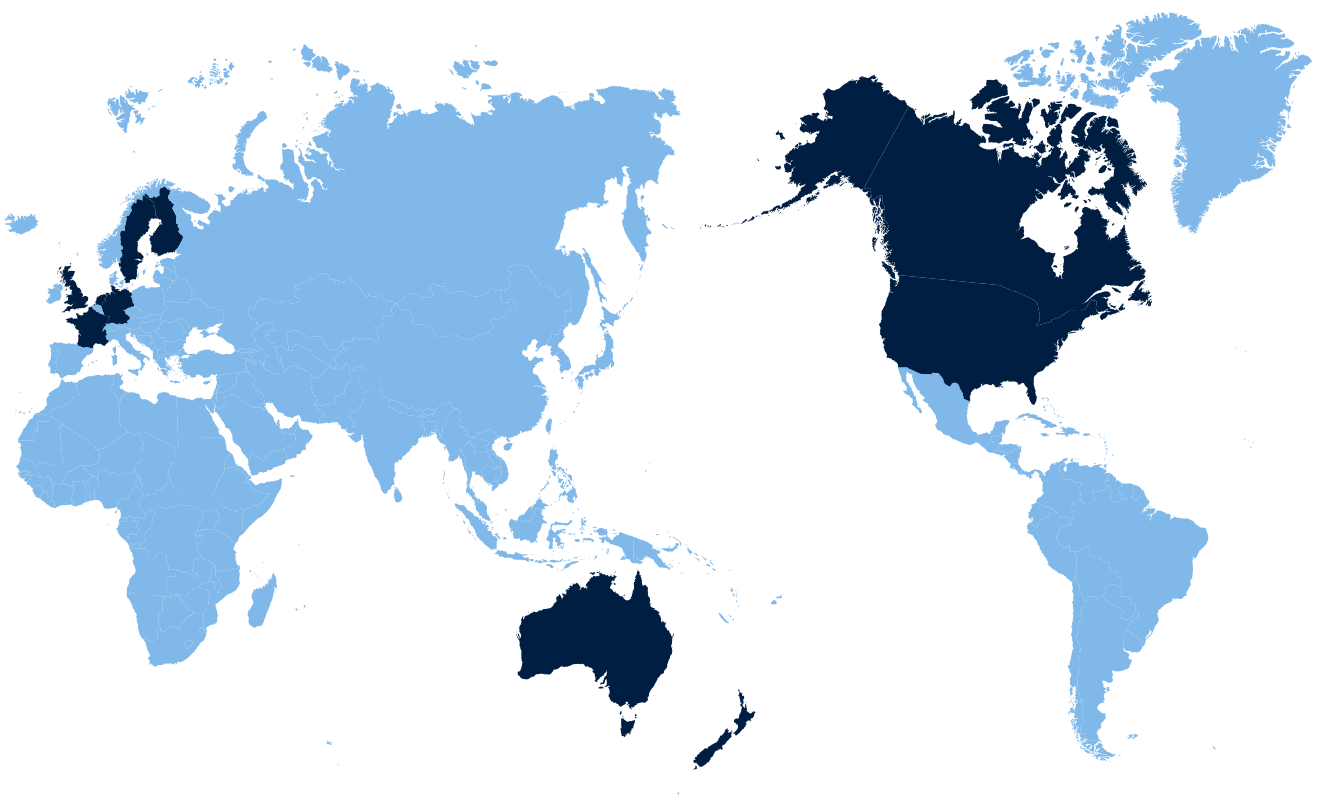
\*source: Ports Australia, State of Trade 2024 Report

### Our supply chain

In the reporting period, the Group made payments to **2,455** 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 small number of overseas suppliers (accounting for 0.93% of all suppliers in the reporting period) included vendors based in the following locations (as highlighted in blue on the map below): **USA, Canada, New Zealand, UK, Sweden, Finland, Germany, France, and Netherlands.**



# 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

As part of 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 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

Whistleblower Policy



## Modern Slavery Governance

To support the implementation of our policy documentation and modern slavery response plan, our robust governance framework ensures effective oversight, monitoring, risk assessment and reporting. 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.

In the reporting period, in line with our 'Group 3 Year Modern Slavery Action Plan', we reviewed and updated our existing modern slavery clauses in our suite of template supplier contacts to ensure we maintain robust contractual mechanisms for ensuring supplier modern slavery compliance throughout our supply chain.

Since April 2020, we have provided a mandatory modern slavery supplier questionnaire (**Supplier Questionnaire**) to our new suppliers in our Vendor Application Pack. As part of a broader Contractor Management Project in the reporting period, we updated our Vendor Application Form. This reporting period, we have also amended and updated our Supplier Questionnaire to ensure that the responses from our vendors better assist our Procurement team to conduct a modern slavery risk assessment at the critical pre-approval stage. Our new tendering platform captures all compliance documents from all vendors once they are approved. This provides a centralised repository for supplier compliance monitoring.

# 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 *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, and our current supply chain risk assessment tool) that it has a relatively low exposure to modern slavery risks through its direct employment of workers.

The Group directly employs most of its 745 strong workforce directly. 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 and promoting better governance.

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 its exposure to key risk indicators such as geographic locations of 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 Whistleblower Policy is an important mechanism to assist us to identify and address 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.

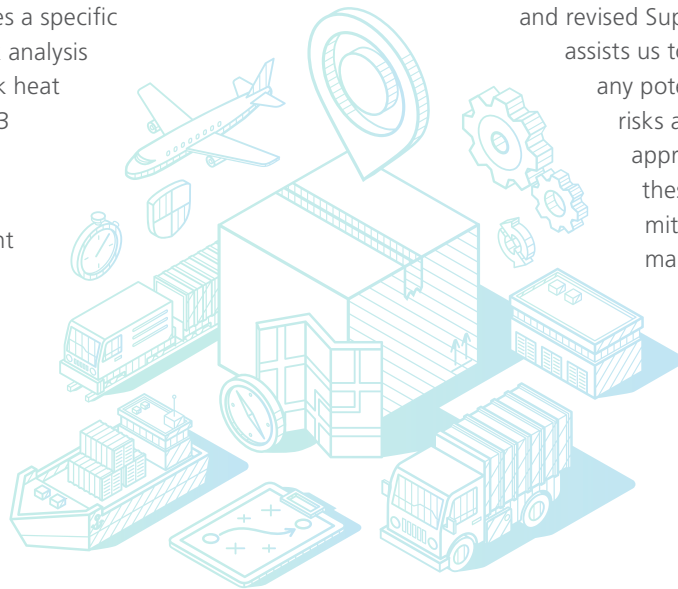
To support these measures, and further assist our employees to identify the risks of modern slavery practices in our operations, we plan to deliver targeted modern slavery awareness training via the specialist training platform we procured during this reporting period.

## 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 **2.2%** percent.

Our new tendering platform, supported by our enhanced Vendor Application Pack documents (including updated Vendor Application Form and revised 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.



# Our actions to assess and address modern slavery risks

Assessing the effectiveness of our actions

## OUR PLAN

In this, our fifth 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 identified as the highest priority as part of our modern slavery response plan.

KEY AREA	PLANNED TASKS	FY24 COMPLETED TASKS
<b>ASSESS AND IDENTIFY</b>		
Risk assessment	Reviewing and updating supplier questionnaires to align with our new supplier risk analysis tool.	Our Supplier Questionnaire has been reviewed and updated to better support useful vendor responses to inform our supplier risk analysis software results.
Supplier due diligence	Reviewing our active supplier management controls and processes under our Supplier Risk Management Framework.	<p>In the reporting period, our Procurement team updated our Vendor Application Form to incorporate modern slavery compliance content. Our new tendering platform captures all compliance documents from all vendors once they are approved. This provides a centralised repository for supplier compliance monitoring.</p> <p>In addition, the modern slavery compliance clauses in our template supplier agreements were reviewed and updated.</p>
	Continuing to refine our processes to target specific measures and controls to address risks related to identified high risk suppliers.	For example, where our Procurement team has identified high-risk suppliers (linked to materiality assessment) our Modern Slavery Working Group is exploring options for delivery of training (see also 'Training, awareness and capacity building').

**KEY AREA****PLANNED TASKS****FY24 COMPLETED TASKS****ACTION**

Training, awareness and capacity building

Embedding modern slavery awareness training for employees.

We have procured a training platform, which includes a specific modern slavery training module. We have explored, reviewed and considered the potential for implementation of this modern slavery training module to train employees internally to ensure modern slavery awareness.

Exploring options for delivering supplier modern slavery awareness training.

While the option to leverage our new training platform to train our suppliers on modern slavery awareness is not currently viable, we continue to consider alternative solutions for supplier training delivery.

Enhancing communication with suppliers about their responsibilities under the Supplier Code of Conduct.

As an outcome of our broader Contractor Management Project, our Supplier Code of Conduct is now available via our [website](#) and included in our new tendering platform.

Collaborating with our Tier 1 suppliers and industry peers regarding modern slavery compliance supply chain activities and industry best practice.

In the reporting period, staff from our Legal and Procurement teams attended a number of peer events with themes and topics relevant to modern slavery (such as procurement conferences run by peak industry bodies). 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 joined the UN Global Compact Australia network and maintained our status as an active participant in the UN Global Compact.

Policy and procedure development

Updating and monitoring of our 3 Year Modern Slavery Action Plan.

We continue to update and monitor the effectiveness of our Modern Slavery Roadmap (now referred to as the 'Group 3 Year Modern Slavery Action Plan').

In accordance with our Group 3 Year Modern Slavery Action Plan, we reviewed our modern slavery clauses in our template supplier agreements.

**REVIEW**

KEY AREA	PLANNED TASKS	FY24 COMPLETED TASKS
Performance assessment	Developing our modern slavery response plan for the next reporting period.	For more on this, please see the 'Looking Ahead' section.
Oversight	Reviewing our Supplier Modern Slavery Risk Management Framework.	<p>In line with timeframes in our Group 3 Year Modern Slavery Action Plan, the review commenced in this reporting period incorporated a number of enhanced supplier control measures, including our updated Vendor Application Form and revised Supplier Questionnaire.</p> <p>Our Modern Slavery Working Group met regularly during the reporting period to oversee our program of work.</p>

## ***Consultation within the Group***

Our internal consultation regarding this Statement reflects the approach the Group takes to the consistent implementation of its compliance activities across its business units and entities, and to our ESG commitments more broadly. Each of the Group's entities has 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 member of the Australian UN Global Compact Network in this reporting period.

Staff and key personnel, including from our Procurement team, have attended conferences run by external specialist providers 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**); and
- South Australia Modern Slavery Network Lead Group, and its business sub-group, facilitated by the University of South Australia's Centre for Enterprise Dynamics in Global Economies.

Key personnel from our Procurement and Legal teams attended the following events industry events during the reporting period:

- Procurement and Supply Australasia (PASA) – Sustainable Procurement and ESG Conference – November 2023; and
- 11th annual PASA Confex October 2023.

In addition, in FY'24 senior personnel have been engaging with port industry peers regarding industry specific modern slavery compliance approaches.

We look forward to continuing to participate in industry leader and stakeholder forums to assist us to be guided by best practice in our modern slavery response plan actions.

In addition, 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 second 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

- Delivering targeted modern slavery awareness training modules for employees via our new training platform.
- Continuing to explore options for delivering supplier modern slavery awareness training.
- Collaborating with our Tier 1 suppliers and industry peers regarding modern slavery compliance supply chain activities and industry best practice.
- Updating and monitoring of our 3 Year Modern Slavery Action Plan.

## Review

- Updating our modern slavery response plan.
- Reviewing our training program.
- Reviewing and refreshing materiality assessment and 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 2024.

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 21 November 2024.



**STEWART LAMMIN**  
CHIEF EXECUTIVE OFFICER, FLINDERS PORT HOLDINGS

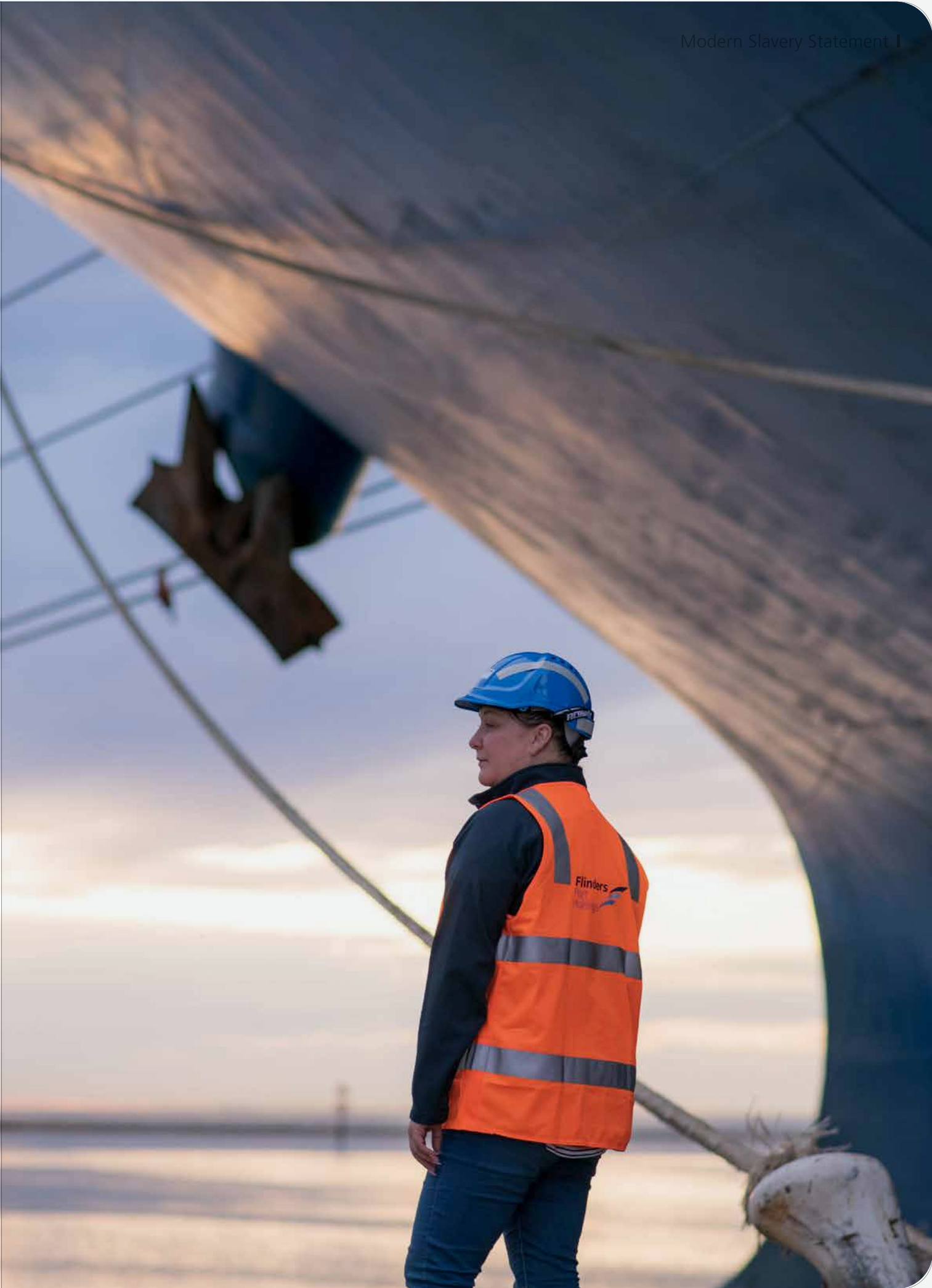
This Statement was prepared to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed within the Statement.

MODERN SLAVERY ACT CRITERIA	FPH MODERN SLAVERY STATEMENT	PAGE
1 Identify reporting entity	Introduction and Appendix A	<b>18</b>
2 Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain	<b>4</b>
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	<b>8</b>
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 Our actions to assess and address modern slavery risks	<b>8</b> <b>11</b>
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	<b>11</b>
6 Describe the process of consultation with any entities the reporting entity owns or controls	Consultation within the Group	<b>14</b>
7 Any other relevant information	Continuous improvement Looking ahead	<b>15</b> <b>16</b>

# ***Appendix A***

Flinders Port Holdings Pty Ltd (**Flinders Ports Holdings**) subsidiary companies (together, **the Group**) in the reporting period (FY24):

- 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





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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.*