



SOUTHERN PORTS

ALBANY BUNBURY ESPERANCE

MODERN SLAVERY STATEMENT 2024





ACKNOWLEDGEMENT OF COUNTRY

Southern Ports acknowledges the Whadjuk, Wardandi, Menang and Wudjari people as the Traditional Custodians of the lands and waters on which we operate and their continuing connection to land, waters and community. We pay our respects to Elders past and present, and extend that respect to all Aboriginal communities.

STATEMENT OF COMPLIANCE

In accordance with section 16 of the *Modern Slavery Act 2018* (Cth) this Statement outlines Southern Ports' commitment to managing relevant modern slavery risks in its operations and supply chains for the year ended 30 June 2024.

STRONG REGIONAL PORTS, STRONG REGIONS

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From the Chair and CEO



As a port authority managing Australia's three south western ports at Albany, Bunbury and Esperance, our supply chains are expansive.

Southern Ports has a critical role in connecting our regional industries in mining, agriculture, energy and forestry to the global market, in turn boosting social and economic prosperity for our regions and our state. We work closely with our suppliers and port community to collectively facilitate more than 35 million tonnes of trade annually.

An unwavering commitment to our vision of 'strong regional ports, strong regions' supports our determination to buy local wherever possible – reflected by more than 40 per cent of our suppliers being regionally based. The nature of our port operations and the services we require, means that many of our suppliers cannot be based locally – and while there are countless benefits and efficiencies of our supply chain model, we acknowledge the complexity can also lead to an increased risk of modern slavery.

As a business we take responsibility for any potential impact our operations may have on modern slavery within Australia and beyond – it's why we are committed to a zero-tolerance approach.

We are in the early stages of developing our modern slavery controls, but are committed to being a leader in our regions and the industry when it comes to modern slavery identification and eradication. We aim to set an example for others when it comes to prioritising the working conditions of our people and everyone who is part of our supply chains.

Ian Shepherd
Chair

Keith Wilks
Chief Executive Officer

About Southern Ports

Southern Ports is a State Government-owned port authority in regional Western Australia.

We provide essential services and infrastructure that underpins the state's economic growth and prosperity through the management of WA's three southern regionals ports at Albany, Bunbury and Esperance.

As a gateway for trade and tourism, our ports collectively handle more than 35 million tonnes of cargo a year across bulk commodities and containers, while also welcoming cruise ships and specialty vessels to our regions.

Together our ports have a rich history of more than 350 years of operation and hold deep connections with our regional communities. Fostering and extending these connections is essential in creating a sustainable future for generations to come and underpins our vision of 'strong regional ports, strong regions'.



OUR OPERATIONS



3 PORTS



4 REGIONS



801 VESSEL VISITS



53 TRADING CUSTOMERS



35.4mt
TOTAL TRADE



16+
COMMODITIES



344
PEOPLE



\$21b
TRADE VALUE

Our ports

PORT OF ALBANY



5.2mt trade



158 vessel visits



34 people

KEY COMMODITIES

- Grain
- Woodchips
- Silica sands
- Fertiliser
- Fuel

KEY CUSTOMERS

- CBH Group
- Plantation Pulpwood Terminals
- AustSand Mining
- Australian Bluegum Plantations
- Commodity Ag

PORT OF BUNBURY



17mt trade



431 vessel visits



85 people

KEY COMMODITIES

- Alumina
- Grain
- Spodumene
- Caustic Soda
- Woodchips
- Mineral sands
- Silica sands
- Copper concentrate
- Coal
- Fertiliser
- Fuel

KEY CUSTOMERS

- Alcoa
- South32
- Bunge
- Talison Lithium
- Iluka
- WA Plantation Resources
- Newmont
- Bunbury Fibre Exports

PORT OF ESPERANCE



13.2mt trade



212 vessel visits



159 people

KEY COMMODITIES

- Iron ore
- Grain
- Spodumene
- Fuel
- Sulphur
- Woodchips
- Fertiliser
- Copper concentrate
- Nickel

KEY CUSTOMERS

- Mineral Resources Limited
- Process Minerals International
- CBH Group
- First Quantum Minerals
- Viva/BP
- Arcadium Lithium
- Southern Pacific Fibre
- IGO

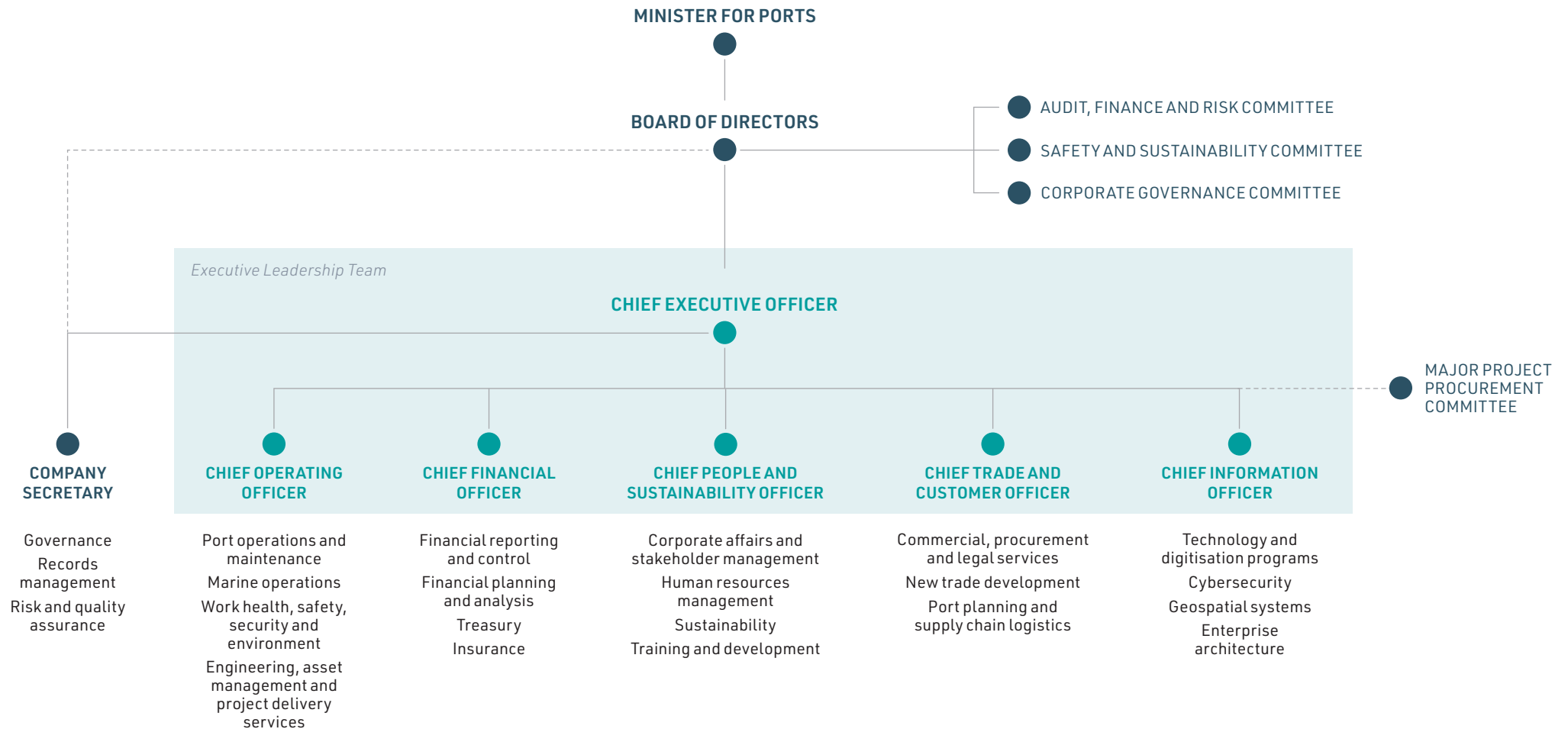




BALLARD

NO SMOKING

OUR ORGANISATION



OUR SUPPLY CHAIN

Suppliers

Supply scope



1,165
SUPPLIERS
ENGAGED

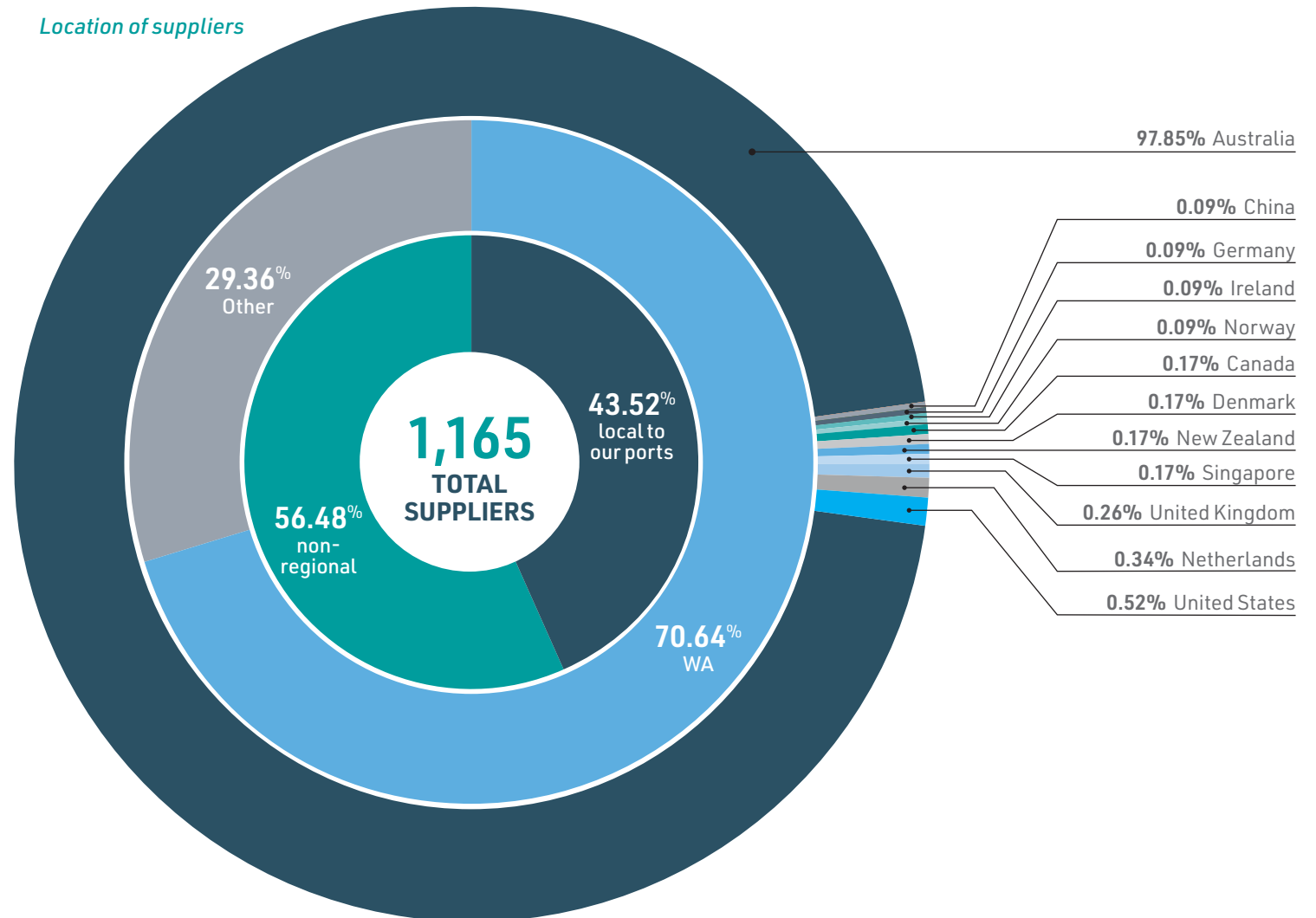


507
REGIONAL¹
SUPPLIERS



12.19%
SUPPLIERS
report under
*Modern Slavery
Act 2018 (Cth)*

Location of suppliers



¹ As per regional contract criteria outlined in WA Buy Local Policy 2022



■ Australia, New Zealand, Canada, China, Denmark, Germany, Ireland, Netherlands, Norway, Singapore, United Kingdom, United States

Supply chain

Types of goods and services procured by Southern Ports includes:

- port infrastructure
- industrial equipment
- facilities services
- business advisory services
- technology and data management
- third-party contracts or licences

Our commitment



Modern slavery is a growing issue that in 2021 impacted almost 50 million people globally.¹ The most vulnerable are women, children and migrants.²

Often hidden in plain sight, the term modern slavery is used to describe circumstances where people are tricked, coerced, or forced into exploitative situations that they cannot refuse or leave, ultimately removing their freedom.³

Australia is ranked in the top three governments taking action⁴ on modern slavery and Southern Ports is proud to be part of that action.

Reducing risk around modern slavery is a priority for our business, and part of our commitment to sustainability and connecting our regions to the global marketplace.

Southern Ports takes a zero-tolerance approach for any of its suppliers found to be engaging in modern slavery practices and undertakes due diligence to assess the risks that suppliers may have in their operations and supply chains.

We acknowledge that as a port authority, we work with a broad range of stakeholders, each with their own level of modern slavery risks. While we aim to lead by example and be a strong advocate, we are mindful that our sphere of control relates to our procurement of goods and services, employment conditions and our working relationship with seafarers visiting our ports.

We are committed to maintaining a high standard of ethical conduct in our business. This is guided by our policies, procedures and standards that set out the expectations of our employees and third-party stakeholders to act in an ethical and honest manner.

These include, but are not limited to:

Internal policies, procedures and standards

- Code of Conduct and Ethics Policy
- Corporate Governance Manual
- Integrity Framework
- Health and Safety Policy
- People and Culture Policy
- Procurement and Contracting Standard
- Grievance Procedure
- Fraud and Corruption Prevention Control Framework
- Fraud and Corruption Prevention Management Standard
- Declaring a Conflict of Interest Procedure
- Gift, Benefit and Hospitality Procedure
- Whistleblowing Management Direction
- Risk Management Policy
- Equal Opportunity, Diversity and Inclusion Plan
- Sustainability Plan

External policies, procedures and standards

- Port Information Guide
- Sustainable Development Guidelines
- Contracting Terms and Conditions

¹ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation





² Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

³ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

⁴ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

Risks for Southern Ports

As a port authority that connects our regional industries to global markets, there are four key categories of modern slavery risks. Where a supplier or product carries risk across multiple categories, there is a higher likelihood that modern slavery practices are taking place and require Southern Ports to act.

	Geographic risks Certain countries have a higher risk of modern slavery due to corruption, displacement, and socio-economic factors like poverty.
	Sector and industry risks Certain sectors are known to have higher risks because of their characteristics, products and processes. Typically these sectors are unregulated and may involve seasonal, low-paying, low-skilled or dangerous/hazardous work.
	Product and services risks Certain products have a higher risk because of the way they are produced, provided or used.
	Supply chain model risks Supply chains consider everyone from our employees to our direct and indirect suppliers. The larger the supply chain, the harder it can be to identify and monitor modern slavery practices. Sub-contracting and the use of labour recruiters in the supply chain also increases risks of modern slavery, especially where recruitment fees are charged.

Geographic risk snapshot

Country	Suppliers engaged (%)	Total Government Response to Modern Slavery (%) ⁵	Total Vulnerability Score to Modern Slavery (%) ⁶	Risk rating
Australia	97.85	67	7	Low
United States of America (USA)	0.52	67	25	Low
Netherlands	0.34	67	6	Low
United Kingdom (UK)	0.26	68	14	Low
Canada	0.17	60	11	Low
New Zealand	0.17	54	8	Low
Denmark	0.17	62	6	Low
Singapore	0.17	47	24	Low
Germany	0.09	62	11	Low
Ireland	0.09	63	9	Low
China	0.09	40	46	Moderate
Norway	0.09	63	1	Low

Table 1: Global Slavery Index 2023 Data by Country

⁵ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

⁶ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

Risk type	Risk category	Potential risk	Assessed risk profile	Southern Ports' response
Geographic risk	International suppliers	For Southern Ports, geographic risks can be relevant for any products that come from moderate and high risk countries as defined by the Global Slavery Index such as China, India, Peru and Malaysia.	Low	<p>More than 97 per cent of Southern Ports' suppliers are based in Australia.</p> <p>The remaining 2.15 per cent are based internationally including Canada, China, Denmark, Germany, Ireland, Netherlands, New Zealand, Norway, Singapore, United Kingdom and United States.</p> <p>Half of these countries of origin have modern slavery legislation which helps to minimise risks. The majority have a 'low' geographic risk rating, except for China which has a more moderate risk rating of modern slavery in its supply chains.</p>
Product and services risk	Personal protection equipment (PPE) and branded merchandise	At Southern Ports, the products that have the highest risk for modern slavery are corporate branded merchandise and PPE. Industries that produce these materials are labour-dependent with each piece travelling through a complex supply chain which has a lack of visibility. Forced labour, minimal pay, lack of worker's rights and social benefits and long hours may be a factor in these industries.	Low	<p>When procuring materials and suppliers, several controls are in place to identify and address risks of modern slavery and to support our broader commitment for conducting ethical business:</p> <ul style="list-style-type: none"> • Procurement and Contracting Standard • Risk Value Assessment • Supplier Questionnaire • Category Specialists and Buyer roles • Technology Governance Committee and procedure • Adherence to government policies and participation in associated initiatives included the Aboriginal Procurement Policy, Australian Disability Enterprise Initiative, Western Australian Buy Local Policy 2022, Western Australian Industry Participation Strategy (WAIPS) and the Building Construction Industry Training Fund (BCITYF) levy.
	Technology equipment	Electronics like laptops and mobile phones are some of the technological equipment at Southern Ports that may present modern slavery risk. In recent years modern slavery has been exposed in big technological supply chains ⁷ relating to debt-bonded labour, forced labour and unethical mineral sourcing.	Low	
	Renewables	As part of our commitment to sustainability Southern Ports has begun exploring solar panels and other renewables for our facilities. An increasing link between renewable energy supply chains to modern slavery has surfaced over recent years due to slave labour in mineral extraction and manufacturing in China, Africa and South America.	Low	
	Building materials and engineered components	Southern Ports has significantly invested in upgrading its infrastructure and asset base throughout the reporting period. Materials and components required to complete this investment are often accessible from international manufacturers in high-risk industries and/or geographies within constrained working condition controls.	Low	

⁷ Informed365 (2022) Modern Slavery Exposed in Big Tech Supply Chains, Informed365.

Risk type	Risk category	Potential risk	Assessed risk profile	Southern Ports' response
Sector and industry risks	Facilities management services	<p>We procure facilities management services from security, cleaning and waste services.</p> <p>These services are typically at higher risk of modern slavery due to a high level of subcontracting, reducing oversight of employee working conditions. These industries also employ a greater representation of people from vulnerable populations such as base-skilled workers, workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds.</p>	Low	<p>Facilities management services are procured through a tender-based process with modern slavery terms and conditions in place.</p> <p>The majority of these suppliers are based locally and operate under modern slavery legislation which provides increased awareness of supply chain risks.</p>
	Workforce	<p>Southern Ports employs 344 people across its organisation with 100 per cent of this workforce employed within Australia, 81 per cent based regionally, and 97 per cent being permanent employees.</p>	Low	<p>Southern Ports engages all employees under appropriate common law contracts of employment or applicable awards and/or registered enterprise agreements.</p> <p>All contractors abide by minimum wage laws, and where relevant applicable awards and/or registered enterprise agreements.</p>
Supply chain model risks	Contractor labour	<p>Contractor labour, particularly in the property and construction industry, can have a high risk of modern slavery due to the high demand for base-skilled labour workforce who are often vulnerable to exploitative practices, poor visibility over long and complex supply chains and low-tier suppliers operating in high-risk geographies.</p> <p>Business models within the sector tend to be heavily based on outsourcing which increases the complexity of operations and supply chains.</p>	Low	
	Seafarer welfare <i>This risk is outside of Southern Ports' operational and supplier obligations</i>	<p>The seafaring industry can be complex and inconsistent due to differing employment arrangements (separate crew agents, ship operating companies and vessel managers).</p> <p>Regulation and oversight of seafarer welfare can also be fragmented due to the global nature of the industry.</p> <p>Exploitation issues can include bullying and harassment, refusal of shore leave, untreated injuries, no access to fresh food, withholding of wages, withholding of identification documents and overtime.</p>	Low	<p>Southern Ports welcomes more than 18,000 seafarers to its ports each year.</p> <p>While seafarer welfare risks are outside of Southern Ports' operational and supplier obligations, we take a collaborative approach, seeing the responsibility as a shared one.</p> <p>Southern Ports' goes above and beyond to improve seafarer welfare across several initiatives including providing Wi-Fi connections to seafarers enabling communication with loved ones, mental and physical health initiatives and shore leave opportunities.</p>

How we assess risk

The level of risk of modern slavery depends on a range of intersecting contextual factors.

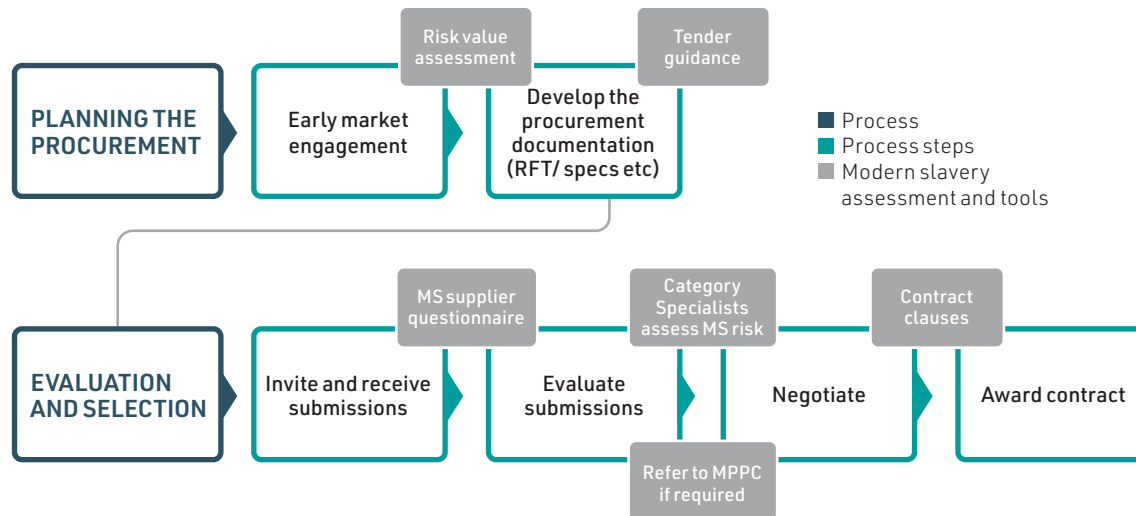
Southern Ports' has modern slavery controls in place through its assessment of suppliers against the Australian Government's procurement modern slavery framework which takes into account four key categories to determine the overall level of risk.

Where a single supplier or product carries risk among multiple categories, the higher the chance that modern slavery practices may be in place, which requires Southern Ports to examine carefully before proceeding.

We take a risk-based approach, and assess high risk parts of our supply chains by:

- requesting information direct from our suppliers about sub-suppliers including country of origin;
- commencing engaging with suppliers to understand how they are addressing their modern slavery risks through a Supplier Questionnaire; and/or
- reviewing existing credible assessments of entities as part of the Australian Government's online modern slavery register.

Modern slavery controls in procurement processes



Our actions

In 2024 Southern Ports continued to increase awareness and identify modern slavery risks through our supply chains, advocate for the rights of vulnerable groups, and improve our systems and processes.

GOVERNANCE

Procuring specialists

Procurement officers are integral in the line of defense against modern slavery.

A restructure of Southern Ports' procurement team led to the establishment of category specialists. This increased our opportunity to identify modern slavery risks, as category specialists have a higher level of awareness and understanding of the risks in their area of expertise.

There is also an increased focus on individual purchases across the business from the procurement support team offering better oversight and risk reduction from a modern slavery perspective.

Technology governance

The introduction of a new Technology Governance Committee and framework at Southern Ports has ensured a consistent approach to the purchase of technology to effectively engage with stakeholders and manage risks including compliance with legal, contractual and policy requirements relating to technology.

SYSTEMS

Supplier pre-qualification

As part of Southern Ports' strategic focus on technology and digitisation, its new supplier pre-qualification software Felix was developed, and onboarding of suppliers into the system commenced.

The Felix system increases our supplier due diligence and oversight of modern slavery risks within our supply chains as part of supplier onboarding and the procuring of goods and services. Using a supplier questionnaire against our assessment framework, Felix identifies any suppliers that could carry risk.

PEOPLE

Equity and diversity

Southern Ports adopted a new Equal Opportunity, Diversity and Inclusion Plan in February 2024.

The Plan identifies how Southern Ports will remain free from racial and sexual harassment, employment practices that are biased or discriminate unlawfully against employees, and how it will achieve workforce diversity.

We know that within modern slavery, women are one of the most vulnerable groups.

Southern Ports is taking a leading role to improve gender equity through a raft of initiatives that generates real momentum:

- Building capacity in the existing workforce with a new Women in Leadership program. Nominations in 2024 doubled, following the completion of the course from 14 participants in 2023.
- To continue progress of its gender diversity and equity journey and set an example, Southern Ports became the first WA port to join CEOs for Gender Equity (September 2023) with others since following its lead.
- Adopting a new, ambitious Diversity and Inclusion Plan in 2024.
- Restructuring our Executive Leadership Team in March 2024 which achieved gender equity at this level for the first time.



SEAFARERS

Support shore leave and seafarer missions

In 2024 Southern Ports supported the Mission to Seafarers and Stella Maris across its three regions through its investment of more than \$150,000. This support assists with the day-to-day running of the services which provide access to our regions for seafarers taking shore leave.

Championing seafarer health

Southern Ports has championed a number of initiatives to improve welfare opportunities for the 18,000 seafarers who visit our ports each year.

In addition to our ongoing support for seafarer welfare groups and providing temporary Wi-Fi capabilities to the visiting vessels, it has also recently donated bikes to the Mission to Seafarers in Esperance and Bunbury to provide seafarers an opportunity to explore the regional towns, and it has had significant benefits on their mental and physical health.

Leading seafarer welfare

Three of the 18 Port Welfare Committees across Australian ports are those for Southern Ports' ports, and we take leading roles in each of these committees.

We also play an active role in advocating for seafarer welfare within the industry and our port communities through speaking opportunities, raising awareness of our seafarer welfare initiatives and encouraging participation in port welfare committees.

Future actions

Southern Ports is committed to reducing risk of modern slavery in its supply chains through identification and mitigation of risks and raising awareness through advocacy.

Action area	Focus
Governance and reporting	<p>Establishment of a modern slavery risk dashboard Improvements of reporting to Major Procurement Projects Committee and the Audit, Finance and Risk Committee through dashboard reporting.</p> <p>Enabling whistleblower opportunities Review of current whistleblower policies, training and opportunities to take place to extend to modern slavery.</p> <p>Continued improvement of policies and procedures Modern slavery clauses and mitigation methods to be identified as part of policy, procedure and framework reviews including of the Procurement and Contracting Standard and our Contracting Terms.</p>
Systems	<p>Screening of new and existing suppliers Using the onboarding and pre-qualification system Felix to continue screening new and existing suppliers to identify any modern slavery risks relevant to their profiles and associated procurement packages.</p>
Education, awareness and advocacy	<p>Further embed modern slavery risk awareness and identification Undertake training and educational messaging to increase modern slavery risk awareness across the business.</p> <p>Extend reach of port welfare committees Partner with port users on port welfare committees to raise awareness of modern slavery in the seafaring industry, and increase seafarer welfare to assist our port users to fulfil their obligations and protect those most vulnerable within the global maritime sector.</p>



Measuring our actions

Southern Ports monitors the effectiveness of our processes, procedures and actions annually to address modern slavery risks within our business and supply chain.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- understanding the level of awareness our team have of modern slavery risks across our business and industry;
- tracking our actions and outcomes;
- partnering with suppliers and vendors to track their impact against our modern slavery framework in our pre-qualification system;
- undertaking internal governance and external assurance processes; and
- extending our level of influence and advocacy in seafarer networks and committees.

Based on the results of these improvements, we will adapt and strengthen our actions to continually improve our response to modern slavery.



Working together

As a Government Trading Enterprise, Southern Ports' has an essential governance framework that supports the implementation of our modern slavery risk mitigation. This framework covers all levels of our business:

Southern Ports Board	Approval of Modern Slavery Statement.
Audit, Risk and Finance Committee	Oversees compliance with <i>Modern Slavery Act</i> reporting requirements.
Executive Leadership Team	Overall responsibility and decision-making in relation to modern slavery.
Major Projects Procurement Committee	A subcommittee of the Executive Leadership Team assists in the effective discharge of governance and oversight responsibilities relating to the delivery of major projects and procurement decisions including modern slavery risks.
Internal specialist teams – Marine, Procurement, Sustainability, Human Resources, Legal	Specialist teams across Southern Ports are responsible for day-to-day management of modern slavery risks and advocacy including actions reported on in this statement.



Reporting framework

Modern slavery reporting criteria	Location in this statement
1. Identify the reporting entity.	About Southern Ports, page 4-11
2. Describe the reporting entity's structure, operations and supply chains.	About Southern Ports, page 4-11
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.	About Modern Slavery, page 12-16
4. Describe the actions taken by the reporting entity and address these risks, including due diligence and remediation processes.	Commitment in Action, page 17-21
5. Describe how the reporting entity assesses the effectiveness of these actions.	Measuring our actions, page 20
6. Describe the process of consultation with any entities the reporting entity owns or controls.	N/A
7. Any other relevant information.	

Modern Slavery Statement 2024

The content of this Modern Slavery Statement was reviewed and approved by the Board of Southern Ports on 21 November 2024. The Chief Executive Officer and Chair of Southern Ports are both decision-making members authorised to sign this statement on Southern Ports' behalf.



Ian Shepherd
Chair



Keith Wilks
Chief Executive Officer



SOUTHERN PORTS
ALBANY BUNBURY ESPERANCE

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