



MODERN SLAVERY STATEMENT
Reporting year ended 31st March, 2023

1. INTRODUCTION

This Modern Slavery Statement is for North Queensland Export Terminal Holdings Pty Ltd ABN 17 154 644 685 (**NQXTHPL**) and NQXT Port Pty Ltd ABN 61 150 498 098 (**NQXTPPL**) (together **NQXT**) which are reporting entities under the *Modern Slavery Act 2018* (Cth) (the Act). This is the joint statement for NQXT.

NQXT is committed to:

- Operating its business in accordance with the Modern Slavery Act 2018 (Cth).
- Ensuring our people understand modern slavery and the risk it presents to our operations.
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients.
- Mitigating modern slavery risk within our operations.
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain.
- Ensuring appropriate transparency with our people, clients, suppliers and stakeholders regarding the maturity of our modern slavery due diligence process and the findings arising from this.
- Enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

This Modern Slavery Statement is prepared in accordance with the Act and describes the Risks of Modern Slavery in NQXT's business, steps we have taken and planning of the next steps to be taken during the financial year, ended 31st March 2023 to identify, manage and mitigate the risks in our operations and supply chains and how we evaluate the effectiveness of our responses.

For the purposes of this statement, references to 'We', 'Us' and 'Our' collectively refers to NQXT and each of its reporting entities covered by the statement.

2. THE NQXT STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.1. STRUCTURE

NQXTHPL is an Australian Proprietary Company, that was established in 2011 and is headquartered in Brisbane, Queensland. NQXTHPL is the holding company of North Queensland Export Terminal Pty Ltd (**NQXTPL**).

NQXTPPL is an Australian Proprietary Company, that was established in 2011 and is headquartered in Brisbane, Queensland. NQXTPPL is the holding company of NQXT Holdings Trust (**NQXTHT**) and NQXT Holdings Pty Ltd (**NQXTHPL**).

NQXTPL with NQXTHT (together NQXT) own the North Queensland Export Terminal (**NQXT or Terminal**) in north Queensland. NQXT acquired the 99year lease of the Terminal in 2011 and continues to be the owner of a strategic asset to Queensland due to the proximity of the Terminal to the resource rich Bowen Basin and Galilee Basin, its remote location, and access to deep water.



2.2. OPERATIONS

At the date of making this statement, NQXT has 5 employees based in our Brisbane office. Employees are employed under individual contracts.

NQXT is an infrastructure provider that focuses on the commercial activities of the business, including the interface with its customers. NQXT maintains a small number of contracts to facilitate the day to day functionality of NQXT, noting that the key day to day operations and maintenance of the Terminal is outsourced to Abbot Point Operations Pty Ltd (“**APO**”) where NQXT and APO are parties to a long term Operations and Maintenance Contract (**O&M Contract**). Under the O&M Contract APO is responsible for all maintenance and operations of the Terminal. Accordingly, NQXT does not have day to day oversight or visibility of the procurement and supply chain activities of APO as the Terminal operator. However, NQXT continues to assess the most suitable and effective risk assessment framework and started embedding these frameworks into our governance processes in order to enable us to assist and satisfy ourselves that APO are trading ethically (see section 4 for further detail).

2.3. SUPPLY CHAINS

We are an infrastructure company, with employees located in Brisbane. We facilitate the efficient and effective export of minerals while safeguarding the environment and meeting our wider obligations to society. Our website (www.nqxt.com.au) provides more detailed information about our business, including our strategy, philosophy, and operations, as well as our approach to sustainability. In addition to the O&M Contract, NQXT manages a small number of suppliers primarily located within Australia.

NQXT continues to enhance its processes and implement new processes aimed at ensuring that we only work with appropriate suppliers who can meet the standards that we expect. Most of our direct suppliers by value are from Australia.

We source a relatively narrow variety of goods and services and NQXT’s aim is to source locally. Not including the O&M Contract with APO, the majority of suppliers are professional services (financial, legal and advisory firms within Australia, where geographical risk is assessed as low in regard to modern slavery). Based on our current processes, we believe our exposure to Modern Slavery Risk is likely to be low. Other risk-based frameworks are still being considered as additional tools to ensure suppliers are acting in line with NQXT’s expectations (please refer section 4 for further detail).

3. MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAINS

The nature of NQXT’s business relates to the ownership of major infrastructure. As outlined above, our direct supply chain is narrow and is limited to primarily services procured for the administration aspect of port ownership.

In relation to NQXT’s operations, we have a limited footprint which relates to our exposure to our customers (the Users of the Port). The Terminal is operated by APO under the O&M Contract. APO exercises control and oversight over the identification and management of Modern Slavery Risk associated with the Terminal operations.

However, we seek to manage our exposure to Modern Slavery Risks by selecting partners and counterparties, with strong governance and human rights practices and ensuing they have adequate risk mitigation processes. Current processes include initial due diligence, the requirement for completion of the Key Supplier Modern Slavery Questionnaire and research on our corporate partners to assess their publicly stated stance on addressing the risk of Modern Slavery. Our current processes and actions are further discussed in section 4.



4. NQXT ACTIONS

4.1. Supply Chain Due Diligence

NQXT undertakes supply chain due diligence in the form of the Key Supplier Modern Slavery Questionnaire. This remains targeted to all suppliers, but generally those with an annual spend of greater than A\$250,000.

In the FY23 reporting period, NQXT undertook an audit of APO's Modern Slavery practices as they relate to the O&M Contract. Details of this assessment are noted in section 4.5 below. Of noting, APO fully complied with the requirements of NQXT and no Modern Slavery issues were identified during the Audit.

The purpose of the Key Supplier Modern Slavery Questionnaire remains unchanged and is to ensure all our major business partners and supply chain stakeholders are aware of their own responsibilities and those of NQXT with respect to managing the risk of modern slavery in the supply chain and to elicit information that NQXT uses to assess modern slavery risks in its supply chain. This questionnaire now forms part of the supplier on boarding process for the NQXT.

4.2 Modern Slavery Awareness Training

NQXT with the assistance of our audit company, developed and delivered a training package that was rolled out to all employees of NQXT in October 2022. The package was tailored by and designed around NQXT's specific business and supply chain structures and frameworks. This training gave an overview of local and global modern slavery trends in related industries and the types of risks our business should be considering. The training package included a tailored and detailed analysis of the application of the legislation to NQXT.

4.3 Policies and Guidelines

NQXT takes guidance from relevant policies and code of conduct, (the **Guidelines**). NQXT and its people conduct business in a manner that respects human rights, treats employees and contractors with dignity and respect, and does not involve modern slavery practices. Procurement for the business is required to be (among other items) transparent, fit for purpose and consider appropriate social, environmental and governance matters.

The Guidelines also prohibit discrimination, based on any protected attribute under the law. The Guidelines are for employees and contractors who are required to understand and adhere to the Guidelines, throughout their employment or engagement.

The objective of the Guidelines is to ensure that the procurement of all goods and services is conducted in an honest, competitive, full, fair, reasonable, transparent, and ethical manner.

4.4 Remediation - Grievances / Complaints

NQXT has a Whistleblowing Policy in place with the reporting route available for both internal and external reports to raise concerns about compliance obligations, corporate governance, bullying and harassment, including any complaint or concern regarding our Modern Slavery Obligations.

The Board and senior management encourage everyone who works with NQXT to speak up and report



any conduct they believe to be inappropriate. We are committed to ensuring that individuals who disclose can do so safely, securely and with confidence that they will be protected and supported.

Our dedicated Whistleblowing Hotline is one of those formal channels. This service is available to any individual who is, or has been a director, employee, secondee, contractor, consultant, supplier, service provider (or their employee or subcontractor), and associates of an NQXT company including relatives, spouses, dependents of these individuals.

The Whistleblowing Policy is regularly reviewed and updated to ensure an effective and transparent grievance process and compliance with relevant laws.

4.5 Supply chain management and supplier on-boarding processes

Since the last reporting period, ended 31st March 2022, NQXT has reviewed and updated its standard purchase contract and standard service contract (General Terms and Conditions) to include Modern Slavery compliance obligations. NQXT procures most of its goods and services under the standard purchase contract. This review, whilst something that will always be evolving, has progressed and the standard suite of NQXT contracts now include modern slavery compliance clauses which obligate the counterparty to take reasonable actions and measures to identify, assess and address the risk of modern slavery practices in the operation's supply chains used in connection with Goods or Services the subject of the contract. In the event the supplier or contractor becomes aware of any such practices that party must take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains.

In respect of NQXT's key supplier APO, and the O&M Contract, both NQXT and APO continue to collaboratively discuss, monitor, and understand the risks of Modern Slavery. Both parties continue to maintain alignment as to the relevance and importance of Modern Slavery compliance. In the current FY23 year, NQXT undertook an audit of APO's Modern Slavery commitment on compliance activities. NQXT found no issues in compliance, which reinforced these shared values.

The key review areas of the audit covered the provision of APO's processes to undertake the commitments made in APO's most recent Modern Slavery Statement and compliance. In addition, and as part of the Audit, APO was able to demonstrate in respect of Modern Slavery,

- The policies and guidelines developed and implemented,
- The control frameworks implemented for assessing Modern Slavery risk,
- The requirements for APO suppliers to provide their Modern Slavery policies,
- The process to commence (and undertake) audits of selected contracted parties, and
- An example of a standard contract template that includes reference to the Legislation.

5. EFFECTIVENESS

NQXT continues to develop processes to assess the effectiveness of actions taken by the Terminal Operator to respond to modern slavery risks with respect to its supply chains and operations. This includes ensuring that the Terminal operator carries out adequate due diligence on its partners in the Terminal's supply chain and complies with its own modern slavery reporting requirements.

NQXT continues to improve the way it distributes information and training to the key staff involved in procurement and engagement of contractors, consultants, and suppliers to the business to ensure they are aware of the measures that are currently in place and those that are to be implemented.



NQXT continues to conduct reviews by the General Manager of Legal and others on the following areas:

- Number of contractors, consultants and suppliers engaged by NQXT;
- Assess the need of NQXT's suppliers to comply with Modern Slavery reporting requirements and informally audit to see if they are compliant.
- Regularly review action items registered internally with respect to Modern Slavery and NQXT's obligations to ensure that Modern Slavery processes are being followed by NQXT.

Finally, NQXT has progressed formalization and documentation of the following internal actions to ensure the effectiveness of its own actions:

- Discussions with entities within the group of NQXT companies on their reporting of identified risks of modern slavery within NQXT's operations supply chain and how this is managed.
- Review our corporate partners' modern slavery statements.
- Conduct an annual review of the supply risk assessment and assessment of controls within NQXT.

6. CONSULTATIONS

NQXT consulted with the Directors in preparing this modern slavery statement and circulated a draft of this statement for review and comment, prior to it being put to the Boards of NQXTHPL and NQXTPPL for final review and approval.

7. LOOKING AHEAD

NQXT continues to assess, develop, and embed improved frameworks to assess and monitor the Modern Slavery Risks in our operations and supply chain.

NQXT recognizes that the risks of modern slavery are complex and evolving. We will continue to work to identify and address these risks in our business and engage with a range of stakeholders, to assess the effectiveness of our actions and enhance our approach.

This Statement was approved by the Boards of NQXTHPL and NQXTPPL on 13 September 2023, on behalf of itself and the other reporting entities covered by the statement.

On behalf of NQXT



Jeyakumar Janakaraj
Director

13 September 2023

