

North Queensland Bulk Ports Corporation Limited

Modern Slavery Statement

1 July 2023 to 30 June 2024 ("Reporting Period")



Contents

Introduction	3
Vision, Mission and Values	3
Vision.....	3
Mission	3
Our Values.....	3
Structure, operations and supply chains.....	4
Structure	4
Operations	4
Port of Mackay.....	5
Port of Weipa.....	5
Port of Hay Point.....	6
Port of Abbot Point.....	6
Employment at NQBP.....	7
Engagement of suppliers and contractors	7
Supply chain	7
During the Reporting Period the key goods, services and materials purchased by NQBP were: Risks of modern slavery practices in NQBP’s operations and supply chain.....	8
Actions taken by NQBP to assess and address identified risks	10
Governance	10
Procurement and Contracting	11
Assessment of effectiveness of actions being taken to assess and address modern slavery risks	13
Consultation with controlled entities	14
Board approval.....	14

Introduction

This Modern Slavery Statement (**Statement**) is made on behalf of North Queensland Bulk Ports Corporation Limited (ACN 136 880 218) (**NQBP**) and its two wholly owned subsidiaries described below (**NQBP Group**) and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). It describes the risks of modern slavery in the NQBP Group operations and supply chain for the Reporting Period and details the progress that the NQBP Group has made to identify, assess and address those risks.

Vision, Mission and Values

NQBP acknowledges that modern slavery occurs in diverse ways that can be difficult to detect and combat – “hidden in plain sight.”

NQBP is committed to assessing and addressing the risk of modern slavery in its operations and supply chains.

NQBP’s Vision, Mission and Values detailed below are consistent with this aim.

Vision

We are recognised as a leader in responsible port trade, where Queenslanders thrive for generations.

Mission

To manage safe, efficient, and fair ports that connect North Queensland to the world by balancing the needs of our iconic surroundings, our communities, and our stakeholders.

Our Values



Care

We care for ourselves, our people, our community and our environment



Connection

We connect with purpose



Courage

We have the courage to challenge, change and adapt



Curiosity

We are curious to explore, investigate and learn

Structure, operations and supply chains

Structure

This Statement covers NQBP and each of its wholly owned subsidiaries Ports Corporation of Queensland Limited (ACN 126 302 994) (**PCQ**) and Mackay Ports Limited (ACN 131 965 707) (**MPL**).

NQBP is a reporting entity under the Modern Slavery Act.

PCQ and MPL do not trade and remain as non-operating companies of NQBP with nil assets, liabilities and employees. NQBP's wholly owned subsidiaries are not reporting entities under the Act as they do not meet the required financial threshold but are voluntarily covered under this Statement.

NQBP is a public company limited by shares, incorporated under the *Corporations Act 2001 (Cth)*. NQBP is a Queensland Government Owned Corporation and is subject to the requirements of the *Government Owned Corporations Act 1993 (Qld)*.

The Queensland Government is the owner of all shares in NQBP. The shares are held by two (2) shareholding Ministers:

- Minister for Finance, Trade, Employment and Training
- Minister for Transport and Main Roads

The NQBP Group have the same Board of Directors, follow the same policies and procedures and operate in the same sector.

The Board of Directors are responsible for the corporate governance of the NQBP Group and are accountable to the shareholding Ministers for NQBP's performance. The Board of Directors have ultimate responsibility for governance and oversight of NQBP's modern slavery risk and are responsible for the approval of this Statement.

From an operational and governance perspective NQBP, PCQ and MPL are considered one entity.

Operations

NQBP is responsible for four trading ports being:

- Port of Hay Point;
- Port of Mackay;
- Port of Abbot Point; and
- Port of Weipa.

NQBP has its head office at the Mackay Harbour, Queensland and operates solely in Queensland.

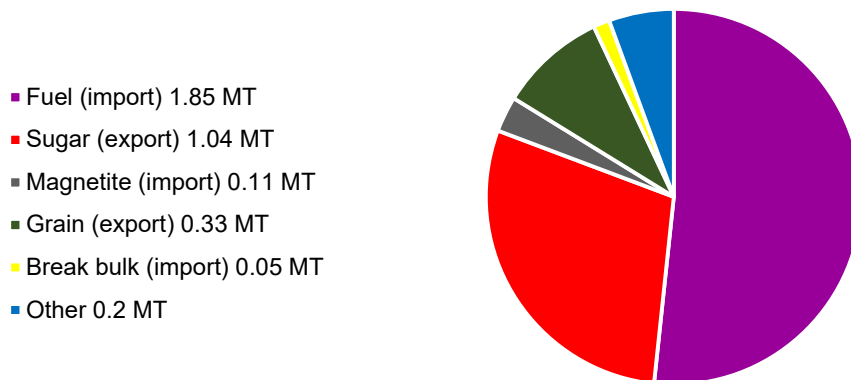
The four ports for which NQBP is responsible, are all located in Queensland.

Port of Mackay

The Port of Mackay was established in 1939 and is the fourth largest multi commodity port by throughput. The Port of Mackay is located five kilometers north of Mackay and about halfway between Brisbane and Cairns and comprises of four wharves within the Mackay Harbour. Mackay is one of the major servicing centers for the Central Queensland mining and agricultural industries.

Port of Mackay statistics during the Reporting Period:

- Total throughput tonnage = 3.58 million

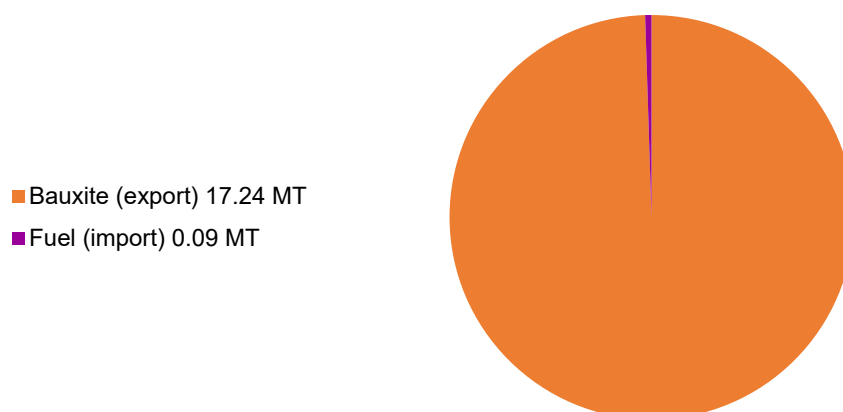


Port of Weipa

The Port of Weipa is situated around 200 kilometers from the northern tip of Australia and facilitates the export of bauxite from mines in the region and the import of fuel and cargo to support those mining operations and other trading activities.

Port of Weipa statistics during the Reporting Period:

- Total throughput tonnage = 17.34 million



Port of Hay Point

The Port of Hay Point, which has been in operation since 1971, is one of the largest coal export ports in the world, primarily exporting metallurgical coal, a key resource in the steel-making process.

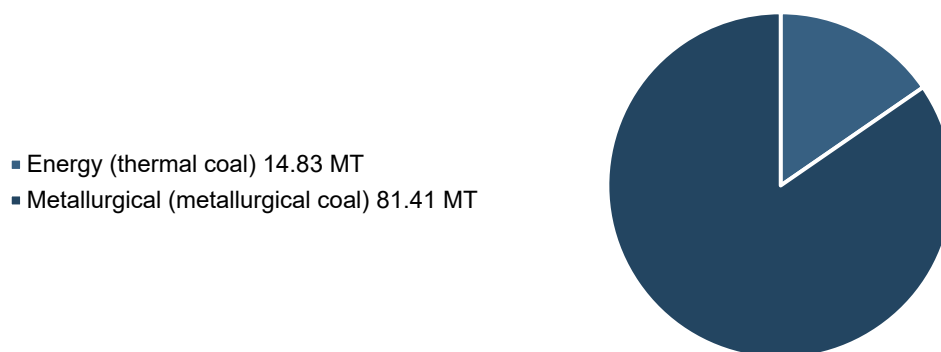
The Port of Hay Point comprises two separate coal export terminals:

- Hay Point Coal Terminal (“HPCT”) which is owned by BHP Billiton Mitsubishi Alliance and is operated by Hay Point Services; and
- Dalrymple Bay Coal Terminal (“DBCT”), which is leased from the Queensland Government Dalrymple Bay Infrastructure.

HPCT and DBCT service coal mines in the Central Queensland Bowen Basin.

Port of Hay Point statistics during the Reporting Period:

- Total throughput tonnage = 96.24 million



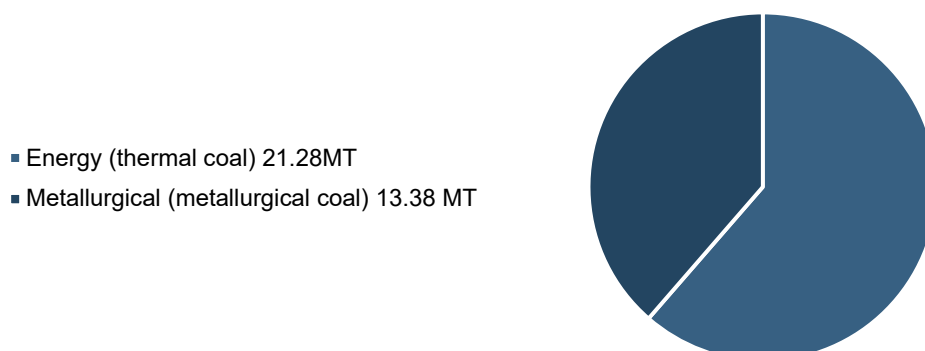
Port of Abbot Point

The Port of Abbot Point has been in operation since the 1980’s and is located between the existing industrial centres of Townsville to its north and Mackay to its south. The Port of Abbot Point is a strategic asset due to its proximity to the Abbot Point State Development Area, and the resources rich Bowen and Galilee basins.

The Port of Abbot Point has one operating terminal, North Queensland Export Terminal (“NQXT”). The trade through the Port of Abbot Point consists of both metallurgical and thermal coal.

Port of Abbot Point statistics during the Reporting Period:

- Total throughput tonnage = 34.66 million



Employment at NQBP

As at 30 June 2024, NQBP directly employed 130 people at its ports and offices in Mackay, Bowen, Weipa and Brisbane.

NQBP has in place, two Enterprise Agreements (“EA’s”). They are:

- General Workforce EA - covering administration and port staff, maintenance and operations; and
- Marine Pilot EA - for marine pilots.

For the Reporting Period, 66% of NQBP’s employees were covered by EA’s. The remaining employees are engaged under individual contracts, which as a minimum, must meet National Employment Standards.

NQBP undertakes both internal and external audits of its payroll system to ensure that NQBP pays its employees correctly. Given these controls, NQBP assessed its direct workforce as having a low risk to exposure of modern slavery.

Engagement of suppliers and contractors

NQBP’s standard contractual terms with suppliers and contractors include a requirement that all employees and subcontractors engaged by either NQBP or a supplier, are employed in accordance with any applicable Australian laws, awards or agreements.

Supply chain

NQBP’s supply chain covers a broad range of goods and services associated with the operation of its business including construction, pilotage, business support services, property and facility management and trade.

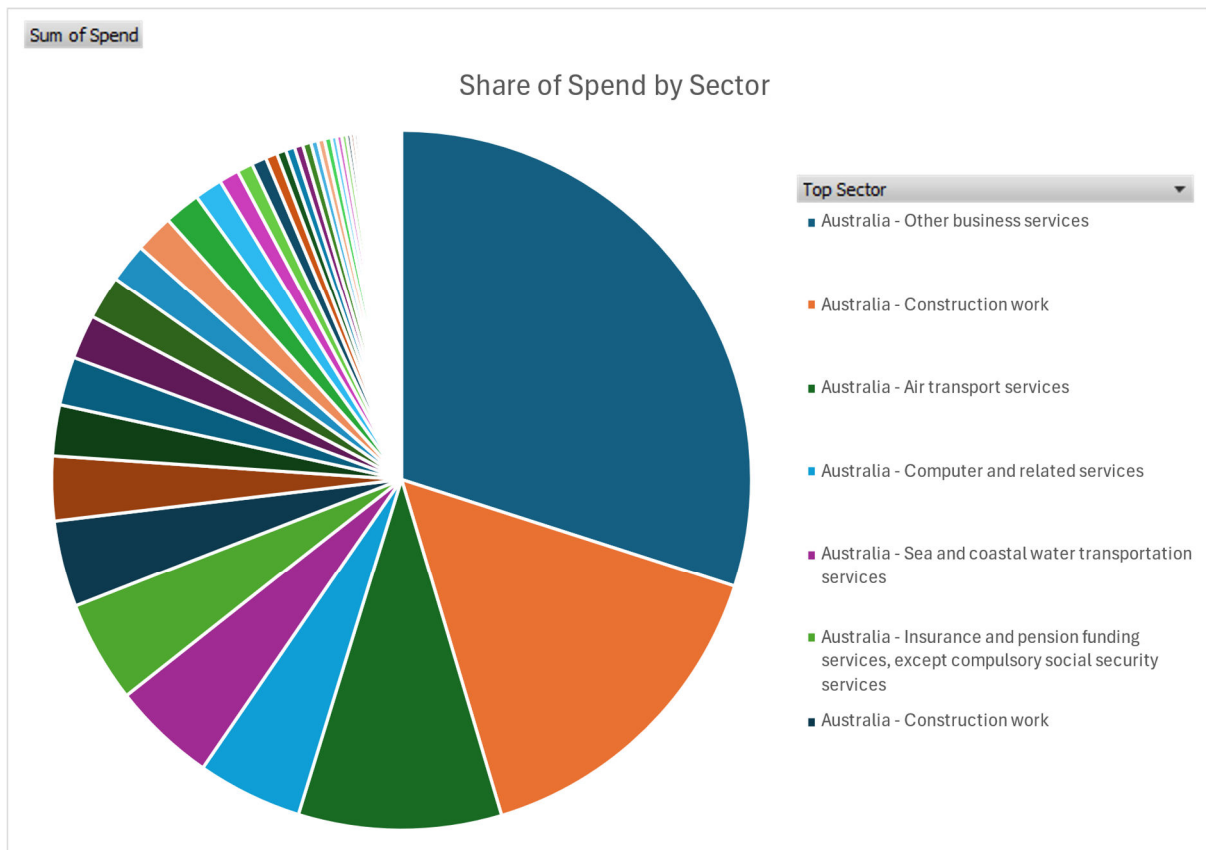
The following table depicts the top 5 contracts which fall into the following four (4) categories that NQBP had with suppliers during the Reporting Period:

Product / Category	Country of Supplier	Industry
Nautical Infrastructure / Wharves	Australia	Non-building Construction
Marine Operations / Helicopters	Australia	Air and Space Transport
Civil Construction	Australia	Construction and Maintenance
Financial Services	Australia	Financial Services

During the Reporting Period, NQBP specifically purchased from 413 registered suppliers. NQBP had a recorded external spend of \$48.38 million for the Reporting Period of which \$48.26 million was addressable with registered suppliers.

NQBP primarily procures spend for major one-off works being capital expenditure or repairs and maintenance to its assets. For the Reporting Period, this amounted to \$10.28 million.

During the Reporting Period the key goods, services and materials purchased by NQBP were:



Risks of modern slavery practices in NQBP's operations and supply chain

During the Reporting Period, NQBP engaged an independent third party to undertake a risk assessment of its operations and supply chains to identify modern slavery risks in its operations and supply chains to better understand its risk of modern slavery. The independent risk assessment carried out by FairSupply determined that NQBP's modern slavery risk during the Reporting Period was quantified as being 0.114 probable persons in forced labour per million dollars spent based on industry category and likely country of source.

This independent risk assessment:

- considered the risk of modern slavery in NQBP's operations and supply chain including all factors that have the potential to cause, contribute or be directly linked to modern slavery in any material way; and
- was carried out based upon the 413 registered suppliers that NQBP had engaged with during the Reporting Period.

The independent risk assessment determined that based on spend with NQBP's first tier suppliers during the Reporting Period, NQBP's top 3 risk categories were:

- Other business services
- Construction work
- Textiles

It is noted that each of the top 3 risk categories were sourced from Australia. During the Reporting Period, all but 2 suppliers of goods / services to NQBP (which were based in the United Kingdom and New Zealand) were based in Australia.

NQBP's internal assessment of its risk of causing, contributing or being directly linked to modern slavery for the Reporting Period resulted in an assessment of risk as being very low. In determining NQBP's risk of modern slavery for the Reporting Period, NQBP considered the following:

- The independent risk assessment undertaken by FairSupply;
- The nature and location of sectors NQBP operates in;
- The nature of suppliers NQBP engages;
- The location of suppliers engaged by NQBP – the majority of NQBP's suppliers operated in Australia; and
- The products and services NQBP sources - the goods and services NQBP procures are from countries with a low inherent risk of modern slavery.

Whilst NQBP notes that the presence and risk of modern slavery in its business operations is very low, NQBP acknowledges that the potential remains for exposure to modern slavery through its customers and suppliers and via the goods and services it procures.

Accordingly, NQBP will continue to engage with its suppliers to better understand these modern slavery risks, will continue to ensure compliance with its procurement and contract procedures (see *Actions Taken* below) and will continue to work with stakeholders to raise awareness on risk indicators (see *Pilotage* below).

Pilotage

NQBP is directly responsible for pilotage services at the Ports of Mackay and Hay Point. NQBP is not directly responsible for pilotage services for the Port of Weipa or Port of Abbot Point. These services are provided by Queensland Government Owned corporations, Ports North and Port of Townsville respectively.

Whilst the risk of modern slavery in NQBP's operations and its supply chain is considered very low, NQBP is aware that its' employees, in particular its' marine pilots, may be exposed to, may witness or may have seafarers disclose instances of modern slavery occurring on international vessels.

To this end, NQBP:

- Conducts a modern slavery induction for all NQBP pilots; and
- Regularly reminds all NQBP pilots to report any instance or suspected instance of modern slavery to their manager.

Where NQBP becomes aware of any incidents or suspected incidents of modern slavery, NQBP reports these incidents directly to the Australian Maritime Safety Authority (**AMSA**) who has jurisdiction to investigate modern slavery and other welfare concerns pertaining to seafarers.

Modern slavery and the welfare of seafarers remains a key area of focus during operational meetings of NQBP's Pilotage team. NQBP's Pilotage team engages with AMSA and the International Seafarers' Welfare and Assistance Network who provide guidance and resources that promote and support the welfare of seafarers, including via the distribution of pamphlets and business cards with contact details for services that can provide support and assistance to seafarers.

NQBP is committed to assisting and supporting organisations such as Stella Maris Australia who provide care and welfare for all seafarers. NQBP demonstrates its support and commitment through making an annual donation to Stella Maris Australia and undertaking an annual Christmas drive for care packages for seafarers.

Actions taken by NQBP to assess and address identified risks

During the Reporting Period NQBP has undertaken the following actions to address NQBP's modern slavery risks.

Governance

NQBP's Board of Directors is responsible for the corporate governance of the organisation and is accountable to the shareholding Ministers for NQBP's performance.

The Board has adopted the governance principles set out in the Queensland Government's Corporate Governance Guidelines for Government Owned Corporations (**Guidelines**), in NQBP's Governance Policy. The Governance Policy is reviewed biannually to improve, where appropriate, NQBP's compliance with the Guidelines. NQBP's Governance Policy is published on NQBP's website.

NQBP's policies, procedures, standards and guidelines require NQBP's Board and employees to promote integrity within NQBP's operations and also require directors and employees to act honestly and comply with the law. NQBP's Standard – Code of Conduct (**Code**) sets out the standards which all NQBP Employees and Directors are expected to uphold. The Code is reflective of NQBP's commitment to promoting ethical decision making. NQBP's business is dependent upon good relationships and fair treatment of its customers, employees, and the public.

NQBP's Code also requires all NQBP Employees and Directors to comply with all NQBP policies, guidelines and procedures. A failure to comply with any NQBP policy documents including the Code, could result in actions being taken in response to the breach.

The policies and procedures which apply to NQBP's Board and employees include the following:

- Compliance Procedure;
- Trading Guidelines;
- Disclosure Procedure and Conflict of Interest Procedure; and
- Whistleblower and Public Interest Disclosure Protection Procedure.

NQBP has in place a training program to ensure all NQBP employees are made aware of the *Public Interest Disclosure Act 2010* (Qld) and the whistleblower regime established under the *Corporations Act 2001* (Cth). All NQBP employees are required to undertake this training at the commencement of their employment with NQBP and biannually thereafter. In addition, NQBP has in place a Whistleblower and Public Interest Disclosure Protection Procedure whereby NQBP personnel can make disclosures anonymously to an independent external whistleblower consultant.

NQBP has developed internal guidance on the Modern Slavery Act and the *Human Rights Act (Qld)* (**HR Act**) which are available to NQBP's Directors, Executive Leadership Team and employees on NQBP's intranet. NQBP is committed to respecting human rights and complying with its obligations under the HR Act including ensuring that its business and operational decisions are compatible with human rights.

NQBP has a Grievance Resolution Procedure in place to ensure that all grievances (including grievances in respect of human rights violations) are managed and investigated in a fair and timely manner. An employee may lodge a grievance with NQBP either personally or by appointing a representative. Where appropriate or necessary, a grievance will be investigated by an independent external party.

Procurement and Contracting

NQBP has a dedicated Procurement team who are responsible for coordinating procurement of all goods and services across NQBP. NQBP undertakes procurement in accordance with the Queensland Procurement Policy. All procurement activities performed by NQBP must be performed with integrity and in a manner able to withstand scrutiny from both internal and external sources. NQBP is committed to achieving the highest standards of ethical behavior in the conduct of its business. NQBP has set standards to which it expects suppliers to adhere to.

NQBP has in place a Procurement Procedure and Contracts at NQBP Procedure that are approved by Executive Leadership Team and reviewed biannually.

NQBP's Chief Financial Officer oversees NQBP's external spend. NQBP's Finance department controls the registration and ongoing control of vendors to be used by NQBP.

NQBP has implemented compliance with the Modern Slavery Act as an assessment criteria when evaluating a tender for contract award. NQBP's tender forms require tenderers to describe the controls (including due diligence processes in connection with procurement and contract management) that tenderers have in place to maintain awareness of their supply chains in order to ensure that there is no modern slavery within their supply chain.

NQBP's standard contract terms set out NQBP's expectations and requirements for its suppliers and their subcontractors regarding compliance with international standards around modern slavery. NQBP's standard contracts contain mandatory modern slavery criteria that must be addressed by its suppliers, including to ensure suppliers are able to demonstrate compliance with the Modern Slavery Act. The standard contract terms provide NQBP with the ability to audit a supplier where NQBP holds concerns. During the Reporting Period NQBP did not identify any concerns of non-compliance with the Modern Slavery Act.

NQBP's standard contracts include a requirement that suppliers must comply with the Queensland Government Supplier Code of Conduct (the **Supplier Code**). The Supplier Code requires that procurement is conducted in an environment of integrity, probity and accountability and that suppliers are committed to the highest ethical standards. The Supplier Code requires suppliers to proactively self-assess compliance and take action to remedy any shortcomings.

NQBP's standard contracts include a requirement that all NQBP's suppliers must meet and comply with the Queensland Government Ethical Supplier Mandate (the **Mandate**) and Ethical Supplier Threshold (the **Threshold**). The Mandate ensures that suppliers supplying to NQBP (as a Government Owned Corporation) uphold their economic, ethical, social and environmental commitments made in tenders and contracts or requirement by policies or laws. Where suppliers (including subcontractors) knowingly fail to comply with their commitments, the Mandate provides for a range of penalties including demerit system or sanction (exclusion from government tendering). The Threshold outlines the wage and entitlement standards expected of suppliers who wish to do business with NQBP (as a Government Owned Corporation).

NQBP's tender documents include mandatory compliance with the Mandate and Threshold and require suppliers to make declarations that they and their subcontractors will comply with the Mandate and Threshold. Non-compliance with the Mandate or Threshold may result in NQBP not engaging the supplier.

As required by the Mandate prior to contracting with a supplier, NQBP undertakes compliance checks through the Queensland Government Procurement Compliance Portal to ensure that a potential supplier is not the subject of a current sanction under the Threshold.

Risk Management

Risk management is an integral part of NQBP's business management. NQBP takes a proactive and well-informed approach to risk management and has a Risk Management Policy, Procedure and Guidelines (**Risk Management Framework**) that provides the strategic direction for risk management. NQBP's ELT continues to be responsible for identifying changes in the business environment that may generate new risks or require a change to risk ratings or controls. NQBP's risk profile is under constant review by the ELT and the Board.

The Risk Management Framework is supported by an assurance program of scheduled internal and external audits of various aspects of the business, such as legal compliance, finance, contract management, asset management, human resources, environment, health and safety, modern slavery, emergency and business continuity planning and information management.

The framework enables NQBP to:

- identify, assess, evaluate, prioritise and manage risks across the organisation;
- create value to the organisation through informed decision making and effective allocation of resources; and
- build a risk aware culture with risk embedded into day-to-day activities.

Risk management is the responsibility of all NQBP employees, including Directors and ELT.

NQBP has embedded modern slavery into its Enterprise Risk Register. The Chief Financial Officer is the owner of the Modern Slavery Risk. Presently NQBP's modern slavery Enterprise risk sits as very low in the Risk Register. In determining NQBP's modern slavery Enterprise risk, NQBP considered the controls it has in place these include:

- NQBP's operations occur in Australia and are governed by Commonwealth and State legislation;
- The key goods, services and materials purchased by NQBP being construction & maintenance, dredging, operations, pilotage, property and risk and assurance are low risk in that they are unlikely to cause, contribute and / or be directly linked to modern slavery practices; and

- NQBP has in place, operating procedures that identify potential modern slavery risks.

To meet strategic objectives, NQBP's Risk Management Framework is designed to apply systematic and consistent risk management methodologies across NQBP to identify critical risk exposures, realise opportunities, prioritise resources and focus on improving capabilities for predicting and managing uncertainties.

During the Reporting Period, NQBP did not identify any instances of modern slavery occurring in its supply chains or any material breaches of risk management policies.

Assessment of effectiveness of actions being taken to assess and address modern slavery risks

NQBP continues to monitor and assess the effectiveness of its actions in identifying and managing modern slavery risks by undertaking internal and external reviews of its governance, procurement and contracting, and risk management processes and controls. Depending on the results of these assessments, NQBP looks to adapt and improve the actions it takes to identify, assess and address modern slavery risks in NQBP's operations and supply chains.

During the Reporting Period NQBP undertook the following actions to assess and address its modern slavery risks:

- Independent external risk assessment of modern slavery;
- engagement with stakeholders – listening and engaging with stakeholders to deliver better outcomes;
- internal and external compliance audits; and
- ensuring compliance with the Mandate and Threshold.

To understand and determine NQBP's risk of modern slavery in its supply chains during the Reporting Period, NQBP engaged an external consultant to undertake a risk assessment. The risk assessment conducted by FairSupply based on NQBP's external spend data for the financial year ending 30 June 2024 and spanned 413 suppliers to NQBP and considered their supply chains based on industry category and likely country of source to 10 tiers.

The risk assessment identified the likeliness of NQBP causing, contributing or being directly linked to modern slavery at Tier 10 was estimated as 0.114 of the total probable persons in forced labour per million dollars spent based on industry category and likely country of source.

The risk assessment supported NQBP's assessment that its' overall risk of causing, contributing or being directly linked, to modern slavery is considered to be very low. This rating is down from the previous reporting period, which demonstrates NQBP's ongoing commitment to eliminating risks of modern slavery in its supply chains.

Going forward, NQBP will continue to assess the effectiveness of its actions by:

1. exploring and implementing proactive tools to assess and identify modern slavery risks with suppliers prior to engaging with NQBP;
2. continue undertaking compliance checks with the Supplier Code, Ethical Mandate and Threshold and modern slavery criteria during the reporting period;
3. continuing through its Pilotage team, to engage with AMSA and report any instances of modern slavery;
4. continue to provide support and assistance to seafarers wellness organisations; and
5. continuing to undertake internal and external audits in accordance with its Risk Management Framework.

Consultation with controlled entities

This Statement was drafted and prepared in consultation with all subject matter experts across NQBP.

NQBP's controlled entities, PCQ and MPL are wholly owned and controlled by NQBP. NQBP and its controlled entities are all covered by NQBP's policies and procedures and are treated as one operational entity from a corporate governance perspective. In preparation of this Statement, a Board paper was prepared for the Board of NQBP, PCQ and MPL advising of the requirements under the Modern Slavery Act and risk of modern slavery in NQBP's supply chain and operations.

Board approval

At the Board meeting held on 28 November 2024, the Board of NQBP, PCQ and MPL used the Board meeting for the purpose of reviewing, considering and consulting each other on the proposed Statement. After working through the consultation process, the Board of NQBP, PCQ and MPL at the meeting passed a resolution approving this Statement.

This Statement was approved by the Boards of NQBP, PCQ and MPL on 28 November 2024.



Jane McTaggart

Chair of the Boards of NQBP, PCQ and MPL



Mackay Office
Level 1, Waterfront Place
Mulherin Drive, Mackay Harbour QLD 4740
PO Box 3340 North Mackay QLD 4740

Brisbane Office
Level 4, 175 Eagle St Brisbane QLD 4000
GPO Box 409 Brisbane QLD 4001

Call: 1300 129 255
Email: info@nqbp.com.au
Website: nqbp.com.au