

Modern Slavery Statement

Dalrymple Bay Infrastructure Limited

for the period ended 31 December 2021

Adopted by the Board on 28 June 2022

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Modern Slavery Statement¹

1. Acknowledgement of Country

Dalrymple Bay Infrastructure Limited acknowledges the traditional custodians of the lands on which the Dalrymple Bay Terminal and DBI's corporate office are situated, the Yuwibara people and the Turrbal and Jagera people. We pay our respects to their elders, past, present and emerging.

2. Overview

Dalrymple Bay Infrastructure Limited (ACN 643 302 032) (DBI), through its foundation asset, the Dalrymple Bay Terminal (DBT), aims to provide safe and efficient port infrastructure and services for producers and consumers of high-quality Australian coal exports. DBT, as one of the world's largest metallurgical coal export facilities, serves as a global gateway from the Bowen Basin and is a critical link in the global steelmaking supply chain.

Modern slavery is used to describe a range of exploitative practices including human trafficking, servitude, slavery, forced labour, forced marriage, debt bondage and child labour. DBI is committed to operating ethically, treating people with dignity and respect and to taking steps to assess and address modern slavery risks within its business and within the supply chain it uses.

The Modern Slavery Act 2018 (Cth) (the Act) requires DBI to outline the risks of modern slavery in DBI's operations and supply chain, the actions taken during the financial period ended 31 December 2021² to minimise those risks and to outline a framework for the assessment of the effectiveness of its actions.

This Modern Slavery Statement is prepared pursuant to the requirements of the Act jointly by DBI, an Australian listed company headquartered in Queensland on its own behalf and on behalf of its subsidiary, Dalrymple Bay Infrastructure Management Pty Ltd (ACN 097 698 916) (DBIM), each a reporting entity for the purposes of the Act.

This Modern Slavery Statement describes how DBI has identified and addressed modern slavery risks in its operations and supply chain in the reporting year commencing on 1 January 2021 and ending on 30 December 2021.

Looking forward, our focus will be on consolidating the progress of the past two reporting years whilst seeking continuous improvement in our practices and procedures in identifying and mitigating modern slavery risks.

3. Structure

The Corporate Structure of the DBI Group is attached at Annexure 1 to this statement.

¹ . In this statement, unless expressly mentioned otherwise, references to DBI and the Group, the Company, we, us and our, refer to DBI and its 100% owned subsidiaries

4. Vision and Values

DBI is committed to living by our values, both within our operations and through engagement with stakeholders. DBI is committed to appropriate transparency in respect of our operations and supply chain so as to positively contribute to tackling the issues associated with modern slavery.

Our values are set out in DBI's Code of Conduct, and are summarised below:

Values

Respect
We respect our people and put their safety and welfare first.

Reputation
We demonstrate integrity and transparency in all that we do.

Accountability
We act like an owner as custodians of the business.

Quality
We collaborate and innovate to deliver quality.

Trust
We build strong relationships with our people, customers and stakeholders.

Stewardship
We are good citizens and consider our impact on the wider community and the environment.



5. Operations and Supply Chain

DBI is an Australian infrastructure company and asset manager that owns, through its wholly-owned subsidiaries, the 99-year lease of DBT located in North Queensland³. DBT is a regulated multi-user export terminal with a nameplate capacity of 85Mtpa located within the Port of Hay Point, approximately 38 km south of Mackay and 900km north of Brisbane in Queensland. DBT is a globally significant export facility. Metallurgical coal is used to produce steel, an essential product in the world's industrialised economy, making DBT a critical link in the global steel making supply chain. Coal handled by DBT is exported to 25 countries, with key markets comprising large demand centres for export metallurgical coal, including Japan, South Korea, India and Europe. The terms and conditions of access to the terminal are regulated by the Queensland Competition Authority, with access currently fully contracted with current users comprising some of the world's largest mining companies and highly experienced coal producers who export coal from 18 mines in the Bowen Basin through DBT.

³ The lease is structured with a 50 year initial lease period (commencing on 15 September 2001) and a 49 year extension option at the option of Dalrymple Bay Investor Services Pty Ltd as trustee of the DBT Trust. The option to extend may be exercised at any time between September 2045 and September 2047.

As the asset manager of DBT, the key functions DBI is responsible for are:

- Regulatory compliance;
- Non-expansionary and expansionary capital works;
- Terminal expansion and associated approvals;
- Managing User and Access seeker relationships;
- Insurance (business interruption; certain public liability; motor and travel);
- Managing the contractual relationship with our third party Operator; and
- Financing.

At 31 December 2021, DBI employed approximately 32 people, located both at the head office in Brisbane, and on site at the terminal at Hay Point.

The day-to-day operation and maintenance of DBT is outsourced to Dalrymple Bay Coal Terminal Pty Ltd (ACN 010 268 167) (the Operator) under an evergreen Operations and Maintenance Contract (OMC). The Operator is jointly owned by a number of Queensland's coal producers, who are a majority of DBT's users (by contracted tonnage). The Operator employs approximately 380 employees and a similar number of contractors, which varies depending on the maintenance works being undertaken at any one time.

The key roles and responsibilities of the Operator are:

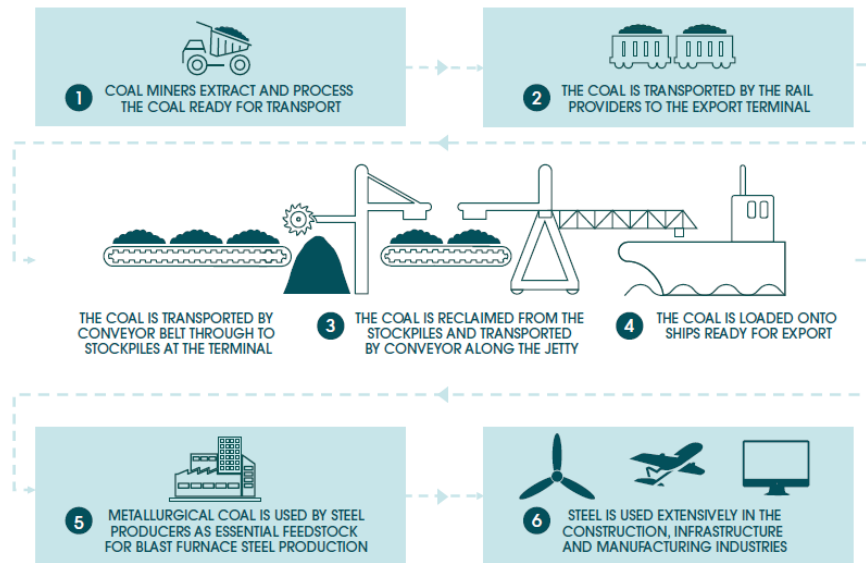
- Day-to-day operation and maintenance of DBT including train scheduling and ordering, train unloading, stockpile management and reclamation, coal blending (if required) and vessel loading;
- Maintenance and repair (scheduled and unplanned);
- Asset Management and condition monitoring;
- Insurance (e.g., industry special risk – property);
- Managing safety at the terminal (as principal contractor);
- Obtaining and maintaining key operational and environmental licences and approvals (excluding licenses and approvals specific to expansions);
- Obtaining and maintaining utilities connections;
- Vessel towage;
- Berth pocket maintenance; and
- Minor capital expenditure.

In this role, the Operator is responsible for the engagement of suppliers and procurement of goods and services to meet the day-to-day operational requirements of DBT.

DBT is a globally significant export facility. Metallurgical coal is used to produce steel, an essential product in the world's industrialised economy, making DBT a critical link in the global steelmaking supply chain and the global economy. Approximately 81% of coal shipped through DBT in 2021 was metallurgical coal.

Neither DBI or the Operator own or consume the coal that is handled and shipped through DBT. Users contract with the rail haulage providers for transportation of coal from the Bowen Basin mines to DBT and retain legal ownership of the coal until it is loaded onto vessels. The coal is sold by DBT's users to export customers who arrange contracts with vessel owners for marine transportation to ports of destination.

Figure 1 – Coal Supply Chain



6. Risks of modern slavery practices in DBI’s operations and supply chain

DBI’s assessment of modern slavery risk for the purpose of preparing this statement is of its direct suppliers of products and services in performing its key functions as an infrastructure manager and owner. For FY 2021, DBI’s assessment of modern slavery risks in its operations and supply chain considered three categories of risk: industry risks, geographic risks and products and services risks to assist in identifying the potential for modern slavery risks in its operations and supply chain. When assessing these risks, we also use information collected in DBI’s vendor onboarding processes, including risk-based screening which allow DBI to assess the risk associated with engaging a particular vendor. For example, DBI uses the services of an online compliance platform to screen potential vendors and to provide ongoing periodic monitoring.

In its direct supply chain, DBI’s largest supplier is the Operator of DBT which has published its second Modern Slavery Statement in respect of its assessment of, and approach to minimising its modern slavery risks in its operation of DBT.

In performing its key functions, DBI works with approximately 180 suppliers who are predominately Australian-based. DBI procures goods and services from a range of suppliers across a variety of sectors including construction, consulting services, information technology, supply of uniforms, corporate services and office supplies.

DBI has reviewed the potential for modern slavery risks utilising its risk management framework to identify the potential for the DBI Group to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain.

To facilitate this, DBI has developed processes to identify sectors and industries, goods and services, and geographic locations which may have a higher inherent risk of modern slavery. This risk assessment approach has been used to perform a review of DBI’s operations and supply chain to identify potential modern slavery risks.

Having regard to its due diligence activities and DBI’s modern slavery risk assessment, it is considered that DBI’s operations and supply chain have an overall low potential for modern slavery risks. DBI’s modern slavery risk assessment is summarised in the table below:

Category	Risk Assessment
DBI Operations	<p>Minimal</p> <p>As an asset manager with a small workforce employed solely in Australia, there is minimal risk of modern slavery within our direct business operations.</p> <p>All DBI employees have employment contracts in place detailing employment conditions and are in accordance with applicable laws.</p>
Terminal Operator	<p>Low to Medium</p> <p>The Operator’s operations and maintenance employees are covered by an Enterprise Agreement, and the company engages with the unions that cover front-line employees.</p> <p>The direct workforce is supplemented by a labour hire provider whose employees are also covered under an Enterprise Agreement. The Operator has a long relationship with its exclusive labour hire provider but recognises that labour hire arrangements may be open to exploitation.</p>
Construction Contractors	<p>Low</p> <p>DBI engages principal contractors to undertake the capital works for which it is responsible who are generally locally based (Mackay and/or Queensland) whose employees are typically local to Mackay.</p> <p>Companies which tender for projects are pre-qualified across a range of areas, including safety management, anti-bribery and corruption practices. Modern Slavery screening of contractors includes additional due diligence of modern slavery risks arising where contractors have an offshore presence.</p>
<p>Other Suppliers</p> <p>Including professional services (consultants, information technology, financial services, insurance and legal services) and other corporate office suppliers.</p>	<p>Low</p> <p>Other suppliers are predominantly based in Australia. Those that are not based in Australia were not identified as being from high-risk countries. Additional due diligence has been undertaken on corporate goods and services linked to industries generally considered high risk.</p>

7. Actions taken by DBI to assess and address these risks

Our Approach

DBI's Modern Slavery Statement outlines what actions DBI has taken in the reporting period to further identify and address modern slavery risks in DBI's operations and supply chain. The statement also demonstrates DBI's efforts to proactively embed modern slavery protections within DBI's policies, procedures, and processes.

To further tackle modern slavery risks DBI has developed a Modern Slavery Policy and Framework to ensure a unified and consistent approach to the identification and management of modern slavery risk in our business. The Modern Slavery Framework consists of four key focus areas: Governance, Risk Assessment, Due Diligence, and Training and Reporting as follows:

Governance

- Modern Slavery Policy and Framework
- Speak Up Policy
- Grievance Policy
- Code of Conduct
- Procurement Policy and Framework
- Anti-Bribery and Corruption Policy and Program
- Vendor Risk Management Procedure
- Risk Management Manual
- Sustainability Strategy

Risk Assessment

- Supplier Prequalification (Principal Contractors)
- Initial Vendor Risk Assessment
- Vendor Risk Indicators including, industry, geographic and products and services
- Ethixbase searches and ongoing monitoring

Due Diligence

- Vendor Risk Assessment
- Modern Slavery Questionnaire
- Ongoing Vendor Monitoring
- Contract Provisions
- Sustainability Strategy
- Internal Audit Oversight
- Speak Out Hotline

Training and Reporting

- Code of Conduct training
- ABC/Third Party training
- Modern Slavery training
- Annual Modern Slavery Statement
- Quarterly Board reporting

Our Governance Framework

DBI takes a proactive approach to governance and risk management and manages risk through Board-approved policies and procedures. Risk management is the responsibility of all DBI employees. DBI’s risk management is supported by an overarching internal audit program. DBI’s Governance Framework is designed to promote the responsible management and conduct of DBI and provides for the oversight of DBI’s management of modern slavery risks.

Figure 2 – DBI’s Governance Framework



DBI’s commitment to managing modern slavery risks is supported by policies and processes that assist to identify, assess and mitigate risks of modern slavery. These include:

- Modern Slavery Policy and Framework
- Speak Up Policy
- Grievance Policy
- Code of Conduct
- Procurement Policy and Framework
- Anti-Bribery and Corruption Policy and Program
- Vendor Risk Management Procedure
- Risk Management Manual
- DBT Sustainability Strategy

Reporting and Oversight

Modern Slavery reporting within DBI comprises an annual report to DBI's Management and Board of Directors which provides an update on progress of DBI's actions to address modern slavery. In addition, issues and risks relating to modern slavery identified during the reporting period are raised, as necessary with DBI Management's Risk Committee, the Compliance Risk and Sustainability Committee and the DBI Board.

Due Diligence and Mitigating Strategies

DBI continues to embed due diligence activities and mitigating strategies to address the potential for modern slavery risks in its day-to-day operations.

These include:

- **Vendor Risk Assessment:** DBI undertakes a vendor risk assessment to assess the nature and extent of any potential exposure to modern slavery risks in its vendors' operations and supply chains. This may also include an assessment of the nature and extent of exposure to modern slavery risks and an assessment of the mitigation strategies that are in place.
- **Modern Slavery Questionnaire:** The purpose of the questionnaire is to assist DBI to understand the business practices of its suppliers (both existing and proposed) and to gauge the level of modern slavery risk associated with a particular vendor. A modern slavery questionnaire will be requested to be completed by vendors where modern slavery risks are identified, in accordance with the Modern Slavery Policy and Framework.
- **Ongoing vendor monitoring:** All vendors are subject to ongoing monitoring through an external compliance and screening provider. All alerts are assessed and based on the outcome of the assessment the vendor risk rating may change.
- **Contract Provisions:** DBI has updated its standard contract suite to incorporate clauses specifically addressing modern slavery and the standards which DBI expects suppliers to adhere to. DBI continues to implement a progressive program for negotiating the inclusion of modern slavery clauses in its existing contracts on establishment, renewal or amendment over time.
- **Speak out hotline:** DBI maintains a Speak out reporting hotline for its employees, suppliers and other interested parties to anonymously report any matters relating to unethical business conduct or violation of laws (including modern slavery concerns). The Navex Global Hotline is available toll-free 24 hours a day, 7 days a week and may be accessed by phone or by the internet.

Implementing Modern Slavery Training

DBI staff are trained periodically in DBI's Code of Conduct and required to provide an annual compliance confirmation.

During the reporting period, DBI has implemented mandatory annual modern slavery training to all employees to build greater awareness of modern slavery risks and issues.

The training focussed on:

- Understanding what modern slavery is;
- Identifying where risk of modern slavery might lie in operations and supply chains;
- Identifying what types of conduct constitute modern slavery;
- Identifying and reporting of incidents that may present a risk of modern slavery;
- Developing an understanding of what can be done to mitigate modern slavery risks;

Internal communications were also distributed to the majority of DBI staff at a monthly all staff meeting to raise awareness of DBI's modern slavery reporting obligations as well as the potential risks of modern slavery in DBI's operations and supply chain.

Impact of COVID-19

The outbreak and spread of COVID-19 had a significant impact on global economic activity in 2020 and into 2021. The Queensland mining industry, including operating mines, rail providers and DBT were excluded from non-essential business closure directions issued by the Queensland Government⁴ and therefore, exempt from government enforced closures implemented to stop the spread of COVID-19.

DBI and the Operator implemented a comprehensive COVID-19 response plan which supported continuity of DBT's operations and safety of the workforce while having limited operational impact on DBT and its users. Importantly, DBI has managed the issues arising from the COVID-19 outbreak and has continued to deliver on its business strategy without financial impact. DBI expects this to continue in 2022 enabling DBI to continue its efforts to assess and address its modern slavery risks as outlined in this statement.

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

During the reporting period we have progressed the initiatives detailed in DBI's first Modern Slavery Statement as we continue to mature and enhance our response to modern slavery risks in DBI's operations and supply chain by:

- Implementing a Modern Slavery Policy and Framework to integrate with DBI's Governance Framework. The Modern Slavery Policy and Framework sets out the requirements for the way in which DBI is to conduct its business to ensure the risks of modern slavery are minimised across DBI's operations and supply chain;
- Continuing to assess new suppliers through DBI's onboarding processes and continuous screening of existing vendors;
- Continued review and negotiation of DBI's construction and capital contracts to incorporate provisions which specifically address modern slavery risks on establishment, renewal or amendment of contracts over time. These contracts represented the material contracts for DBI's business in the reporting period;
- Compulsory modern slavery awareness training rolled out to all staff with a 100% completion rate; and
- Reporting provided as required, to DBI's Management, Compliance, Risk and Sustainability Committee and the DBI Board in relation to DBI's progress on mitigating modern slavery risks in DBI's operations and supply chain.

DBI also recognises that a robust response to a complex issue like modern slavery requires a multi-year approach. In the 2022-2024 reporting periods, DBI expects to continue to review and enhance DBI's approach to identifying and addressing modern slavery risks including by:

- Undertaking an external review of the effectiveness of DBI's supply chain risk assessments in the initial reporting periods;
- Continuing to monitor DBI's performance and effectiveness of its actions including by establishing key performance indicators (KPIs) in 2022.
- Continue to consider new and existing policies and procedures for further opportunities to

⁴ Pursuant to non-essential businesses, activities and undertakings closure directions issued by the Chief Health Officer under s 362B of the *Public Health Act 2005 (Qld)*.

embed modern slavery risk considerations;

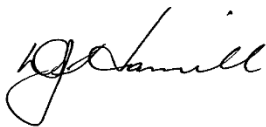
- Including a review of DBI's modern slavery framework within DBI's Internal Audit Program following the recent establishment of DBI's Internal Audit function.
- Enhancing modern slavery awareness training across the organisation to further assist DBI staff to better understand and identify modern slavery risks in the work they perform and the third parties DBI engages with.

9. Consultation within DBI Group

As outlined in paragraph 2 above, DBI has prepared this joint statement for DBI and DBIM as reporting entities for the purposes of s14 of the Act. Prior to approval of the statement by the DBI Board, this statement was reviewed by the Company Secretary for DBI's subsidiaries (including DBIM), together with the Chief Executive Officer and the Chief Financial Officer, each of whom are common directors appointed to DBI's subsidiaries, including DBIM.

10. Board Approval

This statement was approved by the Board of Dalrymple Bay Infrastructure Limited on 28 June 2022.



Hon. Dr David Hamill AM

Chairman

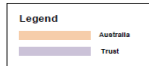
Dalrymple Bay Infrastructure Limited

29 June 2022

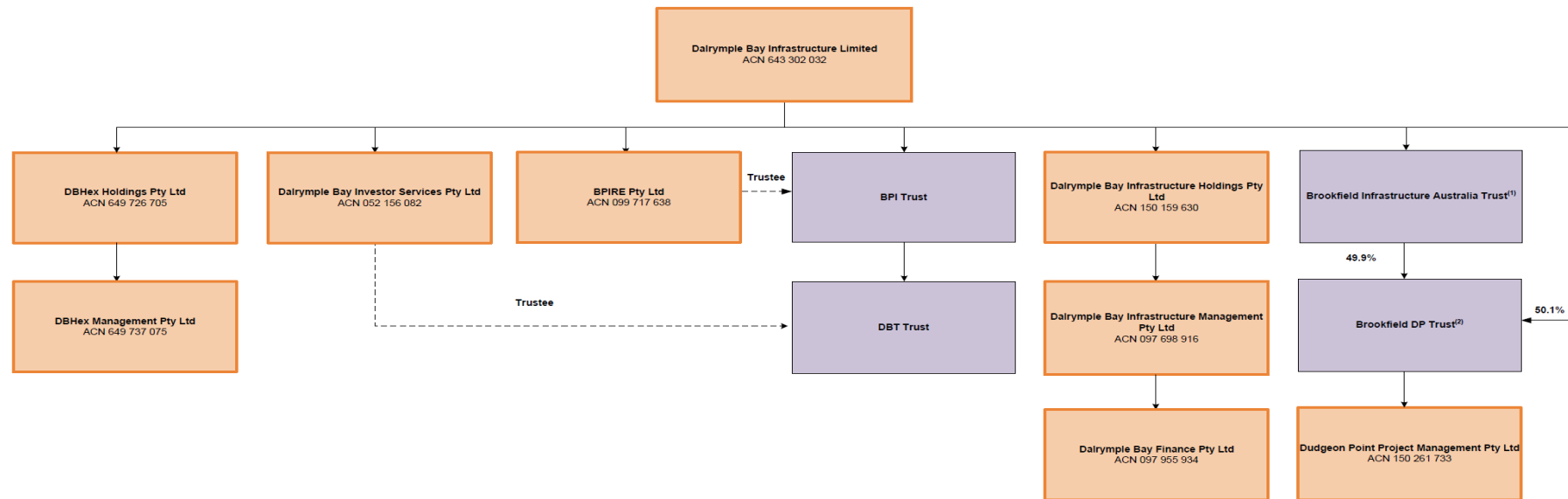
Annexure 1 – Corporate Structure – DBI Group

Dalrymple Bay Infrastructure Holding Structure

As of 3 August 2021



NB: All interests are 100% unless otherwise specified



⁽¹⁾ BPIRE Pty Ltd acts as the trustee of the Brookfield Infrastructure Australia Trust.

⁽²⁾ BPIRE Pty Ltd acts as the trustee of the Brookfield DP Trust.