



Modern Slavery Statement for the year ended 30 June 2020

This is the first Modern Slavery Statement to be made on a joint basis by QGIF Taylor Holdco Pty Ltd, QGIF Taylor Bidco Pty Ltd, Sea Swift (Holdings) Pty Ltd, Sea Swift (Finance) Pty Ltd, Sea Swift Pty Ltd, Sea Swift (NT) Pty Ltd, Perkins Lady Jan Pty Ltd, Perkins Maritime Pty Ltd, collectively known as the Sea Swift Group of Companies (“Sea Swift”), in accordance with the *Modern Slavery Act 2018 (Cth)* in respect of the financial year 1 July 2019 to 30 June 2020. These companies follow the same policies and procedures and share many common suppliers.

Our approach

Sea Swift is committed to developing the appropriate policies, systems and processes to build an effective response over time to the risk of modern slavery.

Sea Swift recognises that modern slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. Sea Swift has taken and continues to take steps to improve our practices to combat modern slavery and human trafficking both within our business and in that of our supply chains.

Our Structure, Operations and Supply Chain

Sea Swift comprises a number of different corporate entities with QGIF Taylor Holdco Pty Ltd ACN 635 867 999 the ultimate parent company and Sea Swift Pty Ltd ACN 010 889 040 our largest subsidiary. Sea Swift Pty Ltd as the primary trading entity within the group meets the reporting threshold requirements of the Act and is required by law to lodge a statement annually.

Sea Swift has a Board of Directors responsible for directing and controlling the group’s activities. The responsibility of Sea Swift day-to-day operations and administration is delegated by the QGIF Taylor Board to the Executive Management team, consisting of the Chief Executive Office, Chief Operating Officer, Chief Financial Officer, and senior executives including the General Manager of NT Operations, QLD Operations and Engineering.

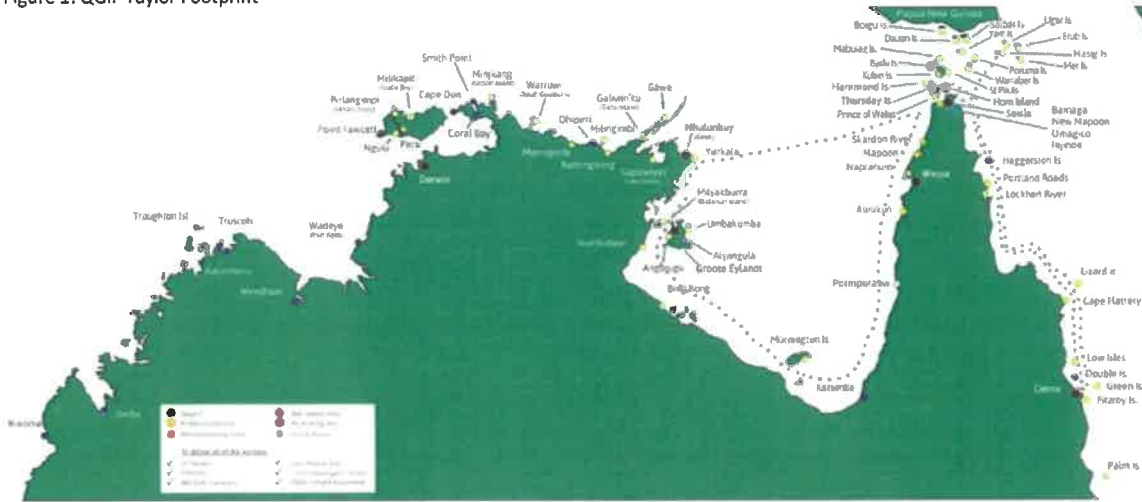
Sea Swift has a workforce of approximately 445 people and is headquartered in Cairns, Queensland, Australia. During the reporting period it had depots located at Horn Island, Thursday Island, Seisia (Bamaga), Weipa and Badu Island in Queensland and Darwin, Gove (Nhulunbuy), Groote Eylandt in the Northern Territory.

Sea Swift is Northern Australia’s largest shipping company and has provided essential services moving general and project freight to the region since 1987. Sea Swift operates throughout Northern Australia’s remote coastal and island communities, with an extensive distribution network across Far North Queensland and the Northern Territory. Other services provided include:

- Mothershipping support to the Northern Fishing Industry
- Vessel chartering
- Adventure Cruises (Qld)

- Fuel Division transporting in excess of 60 million litres per annum to customers located throughout Northern Australia.
- Engineering support

Figure 1: QGIF Taylor Footprint



Sea Swift manages and operates a fleet of 27 vessels servicing the area of operation and has over 600 direct suppliers, which are predominantly located in Australia. Sea Swift also engages with suppliers in other countries such as Indonesia, Singapore, United Kingdom and United States.

Sea Swift procures supplies for the operation and maintenance of its fleet of vessels, mobile equipment, container handling equipment and property. Sea Swift has engaged an offshore shipyard to facilitate the construction of a new vessel and undertake regular, scheduled refit services to the existing fleet. The use of an offshore supplier is currently mitigated by regular audits and an on the ground representative reporting directly to the senior executive on a regular basis.

Risks

The 'risks of modern slavery practices' mean's the potential for Sea Swift to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

We have considered how the Sea Swift may cause, contribute, or be directly linked to modern slavery by undertaking an initial modern slavery risk exposure assessment across suppliers engaged during FY20 financial year.

Geographical and industry key indicators were used in the risk assessment process. This enabled us to identify areas of the Sea Swift Group's business supply chains that are exposed the highest risks in relation to modern slavery.

We engage approximately 660 suppliers through our operations. We identified 42 industry groups that serviced the operations and 73 sub-groups of which 98% are located in Australia.

Some of the higher risk groups of suppliers identified include Construction Machinery & Heavy Trucks and Fuel consumables where 52% of Sea Swift FY20 expenditure attributed to these industries.

We are using this information to enhance our procurement process and to implement a higher level of due diligence. Where Sea Swift does have areas of risk in relation to modern slavery, it will work

directly with its suppliers to better understand their processes to mitigate the risk of modern slavery.

Our policies and Risk Management approach

We will be undertaking a gap analysis of Sea Swift current policies and practices against the requirements of the Modern Slavery Act. This will ensure that the risk of modern slavery is assessed within the group's enterprise risk management framework.

Our policies will support our zero tolerance approach to slavery practices including our Code of Conduct and Whistleblower Policy. We are committed to taking reasonable steps to ensure that genuine concerns of unacceptable behaviour can be reported in good faith with protection for whistle blowers.

Consistent with the aim of the Act, we will seek to build our capacity over time to effectively respond to the risk of modern slavery, including:

- Continue to assess our operations, supply chains for exposure to modern slavery risk.
- Incorporating modern slavery questions into our supplier, tender onboarding and monitoring processes and subsequent supplier due diligence.
- Incorporating modern slavery requirements into our supplier contracts which requires our suppliers to comply with applicable modern slavery laws and requires our suppliers to provide information on how that supplier is dealing with modern slavery compliance if requested.
- make provision for our contracted suppliers to hold their own suppliers to the same standards and we reserve the right to terminate any contractual arrangement if there is breach of the modern slavery laws.

Training and communication

Sea Swift recognises that awareness and education are critically important to combat modern slavery.

Sea Swift has heightened its focus on raising awareness and educating relevant employees. Relevant employees and board members will complete a specific Modern Slavery training as well as annual risk awareness training which will include an Environmental, Social and Governance (ESG) risk module with information on modern slavery.

Our effectiveness in dealing with Modern Slavery.

Sea Swift will continue to improve its existing processes to deal with modern slavery, including by:

1. Continually auditing and reviewing our current business policies and processes with regard to recruitment and treatment of employees.
2. Ensure regular training for our employees is undertaken to raise awareness of modern slavery, including site management training for site based employees.
3. Requiring our suppliers to update their modern slavery information on a regular basis. This will be a continuing process; and
4. Working with key stakeholders to ensure continued focus on, and compliance with, relevant legislation.

Our next steps

Our next steps will include:

- Ensure appropriate due diligence and commitment from proposed new suppliers.
- Expand the role of the Commercial Manager to specifically include responsibility for Modern Slavery reporting.
- Maintain compliance in relevant modern slavery risk frameworks and processes.
- Ensure regular reporting to the Sea Swift Board.

This statement has been approved by the Board of Directors of each of QGIF Taylor Holdco Pty Ltd, QGIF Taylor Bidco Pty Ltd, Sea Swift (Holdings) Pty Ltd, Sea Swift (Finance) Pty Ltd, Sea Swift Pty Ltd, Sea Swift (NT) Pty Ltd, Perkins Lady Jan Pty Ltd, Perkins Maritime Pty Ltd, collectively known as the Sea Swift Group of Companies (“Sea Swift”).

Signed

SR Boulton

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Steven Boulton
Chairman

30th March 2021