



2025 REPORTING
YEAR

2026

MODERN SLAVERY STATEMENT

MORE THAN A PORT

AUSTRALIA’S DEEPWATER
GLOBAL GATEWAY

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1. INTRODUCTION



**Craig
Carmody
CEO**

1.1 A MESSAGE FROM OUR CEO

At Port of Newcastle, we recognise we have an important role to play in the global movement to end modern slavery. As custodians of this vital asset, we are committed to operating our business responsibly and ethically, and to working with key stakeholders, both internally and across the supply chain, to identify, assess and mitigate risks.

In 2025, we proudly built upon the progress our Modern Slavery Taskforce has made to build capacity across our workforce and to continue to support our stakeholders. This included:

- modern slavery training for all staff and external stakeholders by Fair Supply and Mission to Seafarers
- screening 100 per cent of suppliers for modern slavery
- continuing to support seafarers through a multi-year \$100,000 donation to Mission to Seafarers.

Modern slavery is a serious and complex global issue that affects millions of people worldwide. By strengthening our approach, and with the continued support of our Board and Executive Leadership Team, we are driving meaningful, measurable change to help protect fundamental human rights.

Since releasing our inaugural Modern Slavery Statement in 2021, we've taken meaningful steps forward across the organisation, but there's still work to be done. This latest statement reinforces our role as a leader in the maritime sector, and our ongoing commitment to continuous improvement and to protecting and upholding human rights throughout our operations.

1.2 OUR VALUES

At Port of Newcastle, our key values are Community, Wellbeing, Integrity and Curiosity.

We bring these values into our approach to managing Modern Slavery risks across our business.



COMMUNITY: We engage with our employees, contractors, suppliers and community members to work together to identify and combat modern slavery



WELLBEING: We continue to invest in the wellbeing of seafarers, who are at higher risk of modern slavery, than many other port user groups



INTEGRITY: We make it clear in our codes of conduct, contracts, and policies that we do not tolerate any form of slavery or human rights abuses in our business or our supply chains



CURIOSITY: We provide training and encourage our people to be curious, ask questions and seek better ways to do business





1.3 OUR STATEMENT

This is the sixth Modern Slavery Statement produced by Port of Newcastle in compliance with the Modern Slavery Act 2018 (Cth).

This statement details:

- 01 Our reporting entities
- 02 Modern slavery risks in our operations and supply chains in 2025
- 03 Actions taken to identify and address modern slavery risks in our operations and supply chains in 2025
- 04 How we are monitoring the effectiveness of our actions
- 05 Our plans to improve our performance in 2026

2. REPORTING ENTITIES

2.1 REPORTING ENTITIES

This statement is a joint Modern Slavery Statement made by and on behalf of the following entities under the Modern Slavery Act 2018 (Cth) for the reporting period of 1 January 2025 – 31 December 2025:

1. Port of Newcastle Investments (Holding) Trust (ABN 96 485 473 864);
2. Port of Newcastle Unit Trust (ABN 97 539 122 070); and
3. Port of Newcastle Investments Pty Limited (ACN 169 132 441).

In this Statement these three reporting entities will be referred to collectively as **Port of Newcastle** or **PON**.





2.2 OUR STRUCTURE

Port of Newcastle Investments (Holdings) Pty Ltd:

- is a proprietary limited company
- has two shareholders, being China Merchant Ports and The Infrastructure Fund
- is the trustee for the **Port of Newcastle Investments (Holdings) Trust**

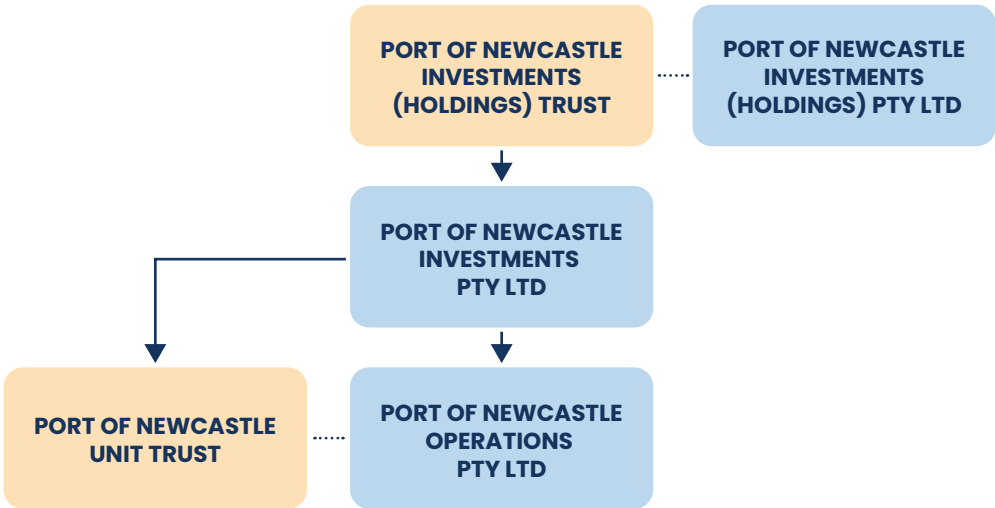
Port of Newcastle Investments Pty Ltd:

- is a proprietary limited company
- is wholly owned subsidiary of Port of Newcastle Investments (Holdings) Pty Ltd

Port of Newcastle Operations Pty Ltd:

- is a proprietary limited company
- is a wholly owned subsidiary of Port of Newcastle Investments Pty Ltd
- is the trustee for the **Port of Newcastle Unit Trust**
- as at 31 December 2025, employed 128 people in Australia

Port of Newcastle Investments (Holdings) Trust and the **Port of Newcastle Unit Trust** are trusts



3.

OPERATIONS AND SUPPLY CHAINS

3.1 ABOUT US

Port of Newcastle is Australia's deepwater global gateway, the largest on the nation's east coast.

Port of Newcastle is more than a port. It exists to build Australia's prosperity with responsible, integrated and innovative supply chain solutions.

With trade worth billions to the national economy each year, Port of Newcastle enables Australian businesses to successfully compete in international markets.

The port has capacity to handle 10,000 ship movements and over 200 million tonnes of cargo annually. With a deepwater shipping channel operating at 50% of its capacity, significant port land available and enviable access to national rail and road infrastructure, Port of Newcastle is positioned to further underpin the future prosperity of the Hunter, NSW and Australia.

As custodians of the region's critical asset, Port of Newcastle is diversifying its trade as it strives to create a safe, sustainable and environmentally and socially responsible future.

Our vision is to build Australia's prosperity with responsible, integrated and innovative supply chain solutions.



3.2 KEY FUNCTIONS

Key functions within our business include:



Trade and Port Development



Management of 780 Hectares of Port



Wharf and Berth Services



Maintenance of Major Port Assets



Vessel Scheduling



Dredging and Survey Services



Legal, Planning and Environment



Finance



Community and Stakeholder Relations



4. RISKS IN OUR SUPPLY CHAINS

4.1 RISK ASSESSMENT METHODOLOGY

During the reporting period, PON continued to utilise the Fair Supply Modern Slavery platform to facilitate the analysis of our supply chains and assessment of the associated modern slavery risks.

Fair Supply provides overall risk ratings for PON's suppliers by analysing up to ten tiers of each supplier's value chain. Risk ratings are generated from a weighted combination of geographic and industry-based risks. Each supplier's modern slavery risk level is expressed on a five-point spectrum from Low to Very High Risk and assigned a numerical figure representing the theoretical number of forced labourers in the supply chain, per million dollars of procurement spend.



4.2 2025 SUPPLIER AUDIT

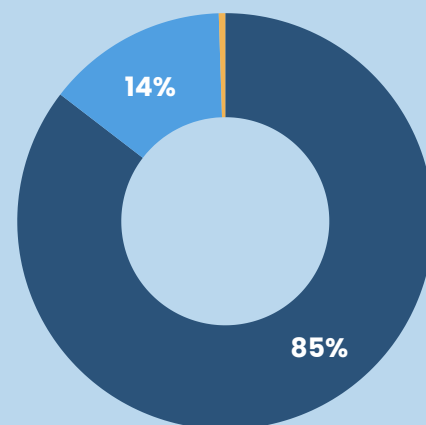
During the reporting year, PON screened modern slavery adjusted risk ratings for 623 suppliers.

A breakdown of key risks is outlined below.

4.2.1 OVERALL RISK RATINGS

The overall risk ratings shown below are similar to the ratings generated from PON's 2024 supplier audit.

Overall Risk Ratings	Percentage of Port Of Newcastle Suppliers
Low	85%
Moderate – Low	14%
Moderate	1%
High	0
Very High	0



4.2.2 GEOGRAPHIC RISK

95% of PON's suppliers are companies incorporated in Australia. The remaining 5% of suppliers reviewed, were headquartered across 14 countries including Canada, Denmark, France, Germany, China, Ireland, Japan, Netherlands, New Zealand, Norway, Singapore, South Korea, UK, and USA.

The majority of these suppliers had a 'low' geographic risk rating.

4.2.3 INDUSTRY RISK

During the 2025 calendar year four suppliers (1%) were found to have a moderate level of modern slavery risk and were sent a follow up questionnaire to determine the overall risk. The moderate risk was assigned based on the ten tiers within each supply chain, with the main risks identified in the textile industry.

These industries are linked to clothing and apparel activities, which are required for PON's PPE and workwear. PON is aware of the modern slavery risks in these industries and seeks to proactively engage with suppliers, in collaboration with Fair Supply, to mitigate known risks, and to seek to procure goods and services from lower risk suppliers.

4.3 CREDIT CARD SPEND AUDIT

During the 2025 reporting period, the Risk & Compliance Manager assessed modern slavery risks associated with suppliers engaged through corporate credit card spend, using industry and geographic risk indicators.

Credit card expenditure increased compared to 2024, with the overall risk profile remaining largely consistent year-on-year. Spend was spread across very-low, low, medium and high risk categories, with only a small proportion classified as very high risk. This was not concentrated, reflects incidental transactions, and remains immaterial in the context of overall exposure.

Higher risk-rated spend more broadly was mainly associated with hospitality, travel and other discretionary purchases. While these areas can carry inherent risk, the geographic profile of transactions significantly reduces overall exposure, with the majority occurring within Australia.

Given the decentralised nature of credit card use, this area continues to be monitored. During 2025, PON delivered Portwise refresher training to credit card holders, focused on promoting responsible purchasing behaviour, with supplier screening processes also in place. Overall, the risk exposure is considered low.

5. OUR ACTIONS

In addition to conducting the supplier audit discussed above, PON undertook the following actions during the reporting period to address modern slavery risks associated with our operations and supply chains:

1. Continuing to support seafarers within the Port of Newcastle
2. Collaborating with Fair Supply and Mission to Seafarers to provide a modern slavery training session tailored to the maritime industry for both PON employees and other external port stakeholders
3. Ongoing compliance with modern slavery ESG targets to screen 100% of suppliers for modern slavery risk
4. Continuing to engage with stakeholders on modern slavery issues; including presenting at the Newcastle Port User Group's quarterly meeting
5. Continuing to operate a modern slavery working group
6. Continuing to incorporate modern slavery training into PON's employee onboarding process, as well as continuing to make recordings available for all staff use
7. Updating our modern slavery procedure to simplify the process for staff and embed risk management processes into credit card spend

5.1 SEAFARER SUPPORT

5.1.1 VULNERABILITIES

As noted in previous statements, PON is aware of significant modern slavery risks and challenges presented in the marine and maritime industries.

Factors which can increase the risk of modern slavery in shipping include:

1. Industry practices of vessels using 'flags of convenience', so that their actions are governed by less stringent regulations
2. Worker shortages which increase workloads
3. Complexity in shipping supply chains, where responsibilities are distributed between various actors including cargo owners, suppliers, charterers, vessel owners, shipping agents, labour hire providers and other parties
4. Geographic isolation, lack of oversight and lack of access to communication technology while at sea
5. Restriction of movement at ports, due to visa restrictions, or local regulations

While seafarers do not directly form part of PON's direct business operations, and are not suppliers to PON, they are a vulnerable group of port users.

5.1.2 GENERAL SUPPORT

PON understands that it is typical for seafarers to work on ships for nine months at a time, with limited ability to access appropriate means of communication, which can leave many isolated from family, friends, and other supports. The Maritime Labour Convention, 2006 (MLC) provides that the maximum continuous period that a seafarer should serve on board a vessel ship without leave is 11 months.

Providing support to this vulnerable group within PON's supply chains is a practical way to minimise the risks of modern slavery practices in those industries.

Our wharf officers are aware of the modern slavery risks to seafarers and are proactive in engaging with seafarers whilst carrying out their duties and raising issues if identified.

PON has continued to provide free Wi-Fi boxes to vessels at berth. These boxes allow seafarers to access the internet in order to communicate with family and access services and information. The WiFi boxes come with a QR code access to multiple languages to link with the Mission to Seafarers. In addition, to better serve our global audience and ensure accessibility for seafarers and others who may not speak English, the PON website is available in English and five additional languages.

PON is also represented on the Port Welfare Committee, which brings together several key stakeholders from the maritime industry across the Hunter Region, including Mission to Seafarers, AMSA, terminal operators, agents, Port Authority NSW, union representatives and Hunternet. The Port Welfare Committee met quarterly in 2025.

5.1.3 MISSION TO SEAFARERS

During the reporting period, PON continued to support the Mission to Seafarers Newcastle. This organisation is part of a global mission founded in 1856 operating in more than 200 ports world-wide. It operates through a network of chaplains, honorary chaplains, lay staff and helpers and provides psychological, emotional, practical and spiritual support for seafarers and their families.

During 2025, PON provided financial and in-kind support to the Mission to Seafarers Newcastle, including:

1. Working closely with the Mission to Seafarers (MTS) Newcastle to supply care packs to vessels on their arrival and facilitate access for MTS on common user berths;
2. Providing a grant of \$100,000 to MTS.



The Mission to Seafarers Newcastle is deeply grateful to the Port of Newcastle for its unwavering partnership and generous support. PON's direct investment in our work has a tangible and profound impact—not only in providing practical services such as free transport, shore leave access, and a safe, welcoming centre—but in upholding the dignity and freedom of seafarers who are often among the most vulnerable workers in the global economy. Through this support, seafarers are given real opportunities to step ashore, connect with others, and access care, advocacy, and protection. In a world where exploitation and modern-day slavery remain a very real threat within the maritime industry, PON's commitment actively contributes to safeguarding human rights and ensuring that those who visit our port are treated with respect, compassion, and justice. We are incredibly thankful for this partnership, which not only enriches the lives of over 50,000 seafarers each year but stands as a powerful expression of what it means to care for those who are too often unseen.

Reverend Garry Dodd
Senior Chaplain | MTS Newcastle

5.2 RISK ASSESSMENT PLATFORM

During the reporting period, PON continued to use the Fair Supply Modern Slavery platform to facilitate the analysis of our supply chains and assessment of the associated modern slavery risks.

The Fair Supply System screens our suppliers by:

1. Carrying out economic analysis using data from proprietary data sets as well as multiple global databases including the United Nations System of National Accounts, the Australian Bureau of Statistics, the Walk Free Foundation's Global Slavery Index and the International Labour Organisation's Global Estimates of Modern Slavery
2. Mapping PON's procurement spending through global markets and multiple supply chain tiers

Fair Supply provides overall risk ratings for PON's suppliers, by analysing up to ten tiers of each suppliers' value chain. Ratings are expressed as a theoretical number of forced labourers per million dollars of procurement spend.

These figures are then aligned with one of five modern slavery risk categories: Low, Moderate Low, Moderate, Moderate High and High.

These categories are intended to assist PON in taking targeted risk mitigation and due diligence activities, in the areas of highest risk.

5.3 SUSTAINABILITY FINANCING

In 2022, PON entered into a sustainability linked hedge transaction. Under this arrangement, the financing of the Port of Newcastle is aligned with long-term environmentally and socially responsible outcomes. This was the first loan in Australia to set financial penalties for missing a set modern slavery KPI. The modern slavery KPI states that PON must screen 100% of suppliers for modern slavery risks during the calendar year. PON achieved this KPI during the 2025 reporting period.

5.4 STAKEHOLDER ENGAGEMENT

The Modern Slavery Working Group have developed a plan to engage with stakeholders and community members on modern slavery risks. During the reporting period, PON staff discussed modern slavery matters and PON expectations:

1. At customer engagement meetings, Community Liaison Group, Port User Group meetings
2. With suppliers during tendering and contracting processes
3. With staff who use PON issued credit cards, to educate on the risks of modern slavery within the different industries

5.5 MODERN SLAVERY WORKING GROUP

PON's Modern Slavery Working Group is comprised of staff from multiple business units.

During the reporting year, the Working Group:

1. Undertook business-as-usual actions to mitigate modern slavery risks
2. Communicated with PON staff about new modern slavery screening processes and researched future training options;
3. Advocated for strong action on modern slavery with internal staff and external stakeholders;
4. Assisted in the preparation of this modern slavery statement; and
5. Supported PON staff to screen suppliers for modern slavery risks.

5.6 STAFF TRAINING

During 2025, new starters at PON completed compulsory ESG training, which included a specific module on modern slavery and PON's obligations to identify and mitigate risks in its supply chains. PON engaged Fair Supply to undertake an in-person training session for both internal and external stakeholders.



6.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Port of Newcastle will continue assessing the effectiveness of the actions it is taking to identify and address the risks of modern slavery practices in its operations and supply chains in the following ways:

1. Continuing our annual audits of credit card spending to ensure that all suppliers are screened;
2. Comparing the results of our supplier audits year on year, to identify any trends or key risk areas;
3. Ensuring that our Modern Slavery Working Group considers and reviews the need for staff training on modern slavery issues; and
4. Continuing to monitor progress against annual modern slavery action plans.

7.

CONSULTATION PROCESS

This Statement was prepared with input by members of our Modern Slavery Working Group, PON's executive leadership team, and the Board responsible for each reporting entity.

8.

OUR GOALS

FOR 2026

PON has developed a modern slavery action plan for the 2026 calendar year.

Key goals in that plan include:

- 1. Continually improving and automating our supplier auditing procedures and ensuring staff are trained in the new procedures;
- 2. Continuing to provide direct support to seafarers throughout 2026;
- 3. Updating our ESG training modules to include improved training across important topics inclusive of modern slavery, anti-corruption and human rights risks.
- 4. Presenting information regarding modern slavery risks to our Community Liaison Group.

STATEMENT ANNEXURE

This Modern Slavery Statement was approved by the principal governing body of the Port of Newcastle, as defined by the Modern Slavery Act 2018 (Cth) (the Act), on 18th June 2025.

This modern slavery statement is signed by a responsible member of the Port of Newcastle, as defined by the Act:



Craig Carmody, CEO



Clinton Dines, Board Chairperson

This statement addresses each of the mandatory criteria in section 16 of the Act as set out in the table below:

MANDATORY CRITERIA	SECTION NUMBER
Identify the reporting entity	2
Describe the reporting entity’s structure, operations and supply chains	2 & 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	5
Describe how the reporting entity assesses the effectiveness of these actions	6
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	7
Any other information that the reporting entity, or the entity giving the statement, considers relevant	1 & 8



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