

# Modern Slavery Statement

Dalrymple Bay Infrastructure Limited

for the period ended 31 December 2023

Adopted by the Board on 20 June 2024



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## Modern Slavery Statement<sup>1</sup>

### 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 describes 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.

This is DBI's fourth Modern Slavery Statement and describes how DBI has identified and addressed modern slavery risks in its operations and supply chain in the reporting year commencing on 1 January 2023 and ending on 31 December 2023. Modern Slavery risks in DBI's supply chain continue to be assessed in our annual risk assessment as low and there were no instances of modern slavery concerns reported to DBI.

We recognise that the pathway to the eradication of modern slavery in Australian supply chains is an ongoing journey and DBI will continue to work to undertake actions to understand, identify and mitigate modern slavery risks in its own supply chain.

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 2023 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.

#### 3. Structure

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

<sup>&</sup>lt;sup>1</sup>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:





#### 5. Operations and Supply Chain

#### **Operations**

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 Queensland<sup>2</sup>. 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. During the reporting period, coal handled by DBT was exported to 23 countries, with key markets comprising large demand centres for metallurgical coal, including Japan, South Korea and India.

The terms and conditions of access to the terminal are regulated by the Queensland Competition Authority under the 2021 Access Undertaking. DBT's Users who access DBT for coal-handling services include some of the world's largest mining companies and highly experienced coal producers who exported predominately metallurgical coal from 21 mines in the Bowen Basin during the reporting period.

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



At 31 December 2023, DBI employed approximately 37 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 445 employees and engages a similar number of contractors, which varies depending on the maintenance works being undertaken at any one time.

<sup>&</sup>lt;sup>2</sup> 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.

<sup>\*\*</sup>DBI is also responsible for other insurance such as for its motor vehicle and travel.



The key roles and responsibilities of the Operator are:



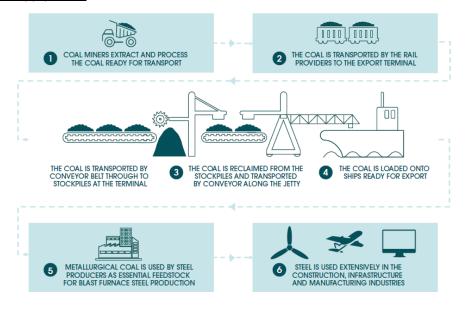
In this role, the Operator is responsible for the engagement of suppliers and procurement of goods and services to meet the day-to-day operational requirements of DBT.

### Supply Chain

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.

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 operators for marine transportation to ports of destination.

Figure 1 – Coal Supply Chain





## 6. DBI's Modern Slavery Framework – Ongoing focus on Risk Assessment in 2023

To continue to tackle modern slavery risks, DBI operates under its Modern Slavery Policy and Framework to ensure a unified and consistent approach to the identification and management of potential modern slavery risks in our business and supply chain. 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
- · Risk Management Manual
- Sustainability Strategy
- · Internal Audit Oversight

#### **Due Diligence**

- Modern Slavery Supplier Due Diligence Questionnaire
- Vendor compliance screening and ongoing monitoring
- Contract Provisions
- Speak Out Hotline

#### Risk Assessment

- · Supplier prequalification (Principal Contractors)
- · New Vendor Onboarding Initial Assessment
- Modern slavery risk factors: vulnerable populations, high risk business models, high risk categories and high risk geographies
- Vendor compliance screening and ongoing monitoring

#### Training and Reporting

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

In the 2023 reporting period, in addition to our annual Modern Slavery Risk Assessment and usual risk-based New Vendor On-boarding assessments, we have required mandatory completion of DBI's Modern Slavery Supplier Due Diligence Questionnaire by all suppliers tendering for DBI's non-expansionary capital expenditure programs (NECAP) enabling DBI to perform comprehensive modern slavery risk assessments on these suppliers. This requirement is reflective of the current significant NECAP Projects underway and the corresponding increase in number of suppliers expected to be engaged by DBI over the project lifecycles.

Under DBI's Modern Slavery Risk Assessment, DBI assesses supplier exposures to four key Modern Slavery Risk Factors:

- **Vulnerable populations** including people whose personal characteristics may lead them to be more susceptible to modern slavery, for example, migrant workers and base-skill workers.
- High risk business models involving third party labour arrangements or contractors.
- Assessment of Product and Service Categories where the potential for exploitative labour practices is more likely, for example, in manufacturing, and in services, such as cleaning and Information, Communications and Telecommunications (ICT) hardware.
- High risk geographies where DBI's activities intersect with known high-risk geographies, through
  its procurement of ICT hardware and in machinery used in construction and maintenance at the
  terminal.

#### 7. 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.



In performing its key functions, DBI works with approximately 150 suppliers who are predominately Australian based. DBI's procurement spend is spread across three overarching categories being DBI Corporate Operations and Corporate Goods and Services, Capital Works and Operations (including the Terminal Operator) and Professional Services.

These three categories of spend were analysed against the four Modern Slavery Risk Factors detailed above.

The risk assessment identified five sub-categories where DBI's supply chain may be exposed to potential higher modern slavery risks:

- Facilities management and services;
- · Office equipment and merchandise;
- ICT hardware;
- Machinery and Equipment; and
- Construction and Maintenance.

When further assessing suppliers for modern slavery risks, we also use information collected in DBI's vendor onboarding processes, including systematised compliance screening which allow DBI to assess the risk associated with engaging a particular vendor. For example, DBI uses the services of an independent online compliance platform to screen all potential vendors and to provide ongoing monitoring throughout the life of DBI's engagement with the supplier.

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

DBI's Modern Slavery Risk Assessment for the reporting period is summarised in Table 1. We have included a comparative trend rating against each category. It can be seen that the Capital Works and Operations category has a continued upward trend due to the large NECAP Projects currently underway at DBT which has seen increased procurement spend on machinery and equipment.

DBI continues to perform risk assessments under its Modern Slavery Risk framework on its suppliers and since 2021 has engaged with approximately 20% of its suppliers who have completed DBI's Modern Slavery Due Diligence Questionnaire, assisting DBI to make more informed assessments of potential modern slavery risks in DBI's supply chain. In the reporting period, no DBI suppliers have been assessed as having the potential of high modern slavery risk. In addition, in 2024, following the end of the reporting period, any suppliers that have been determined to have the potential for moderate modern slavery risk along with certain ongoing suppliers in higher spend categories will be reassessed through follow-up Modern Slavery Due Diligence Questionnaires and where necessary, additional engagement. In addition, DBI requested its largest supplier, the DBT Operator, to complete a follow-up updated Modern Slavery Due Diligence Questionnaire to facilitate DBI's further engagement with the DBT Operator on modern slavery risks. This approach reflects DBI's commitment to ongoing review of any potential or emerging modern slavery risks.

Through the annual risk assessment process, we also confirmed that 58 of DBI's 150 suppliers have Modern Slavery Statements in place providing further assurance that a high percentage of DBI's suppliers have developed policies and procedures to identify and manage their modern slavery risks.

Having regard to the supplier risk assessment and DBI's subsequent due diligence activities, DBI considers that there is a low overall risk for the DBI Group to cause, contribute to, or to be directly linked to modern slavery through its operations and supply chain.



DBI's modern slavery risk assessment for its operations and supply chain for 2023 is summarised in Table 1 below:

Category	Relevant Inherent High Modern Slavery Risk Areas/Industry	Relevant Modern Slavery Risk Factors	Risk Assessment	2023 Trend
DBI Operations and Corporate Goods and Services	Facilities Management Services Office Equipment and Merchandise ICT Hardware	Vulnerable Populations High Risk Business Models High Risk Product and service categories High risk geography	As an asset manager with a small workforce employed solely in Australia, there is minimal risk of modern slavery within our direct business operations.  All DBI employees have employment contracts in place detailing employment conditions and are in accordance with applicable laws.  Applying the Modern Slavery Risk Factors implemented under our Modern Slavery Risk Framework, the key potential risks for DBI in its direct supply chain arise from:  Procurement of workwear from an Australian supplier;  Office supplies; and  ICT hardware, where there is limited visibility of labour conditions of workers and manufacturing supply chain inputs. DBI has undertaken additional due diligence of its apparel supplier. Refer Case Study below.	Stable
Capital Works and Operations	Machinery and Equipment Construction and Maintenance	Vulnerable Populations High Risk Business Models High Risk Product and service categories High risk geography	Low to Medium  DBI engages contractors to undertake the non-expansionary capital works for which DBI is responsible who are generally locally based (Mackay and/or Queensland) and whose employees are typically local to Mackay.  Companies which tender for projects are prequalified 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.  Applying the Modern Slavery Risk Factors implemented under our Modern Slavery Risk Framework, the key potential risks for DBI in its direct supply chain arise from its purchase of construction and maintenance services and machinery and equipment.  In 2023, DBI commenced substantial new NECAP Projects for DBT. In light of the significant number of expected new suppliers to be engaged during these projects, DBI introduced the requirement for all prospective suppliers for these projects to complete	Up



Category	Relevant Inherent High Modern Slavery Risk Areas/Industry	Relevant Modern Slavery Risk Factors	Risk Assessment	2023 Trend
			DBI's Modern Slavery Supplier Due Diligence Questionnaire enabling DBI to perform a review for modern slavery risks prior to award of the contract to the successful tenderer. In addition, DBI will continue to prioritise ongoing review of certain current suppliers who have been reassessed to have a potential for higher modern slavery risks given their construction and maintenance activities.	
Terminal Operator	Construction and Maintenance Machinery and Equipment	Vulnerable Populations High Risk Business Models High Risk Product and service categories High risk geography	Low to Medium  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.  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.	Stable
Professional Services			Low Suppliers in this category 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 where modern slavery risks have been identified.	Stable



#### **CASE STUDY – APPAREL SUPPLIER**

DBI recognises that a supplier may source products such as fabric, steel, parts or technology products from overseas and these overseas sources could have the potential to be linked to modern slavery practices, these are areas of vulnerability in DBI's tier two levels of its supply chain.

DBI also acknowledges risk of modern slavery may be heightened in some goods and services that DBI procures such as cleaning services, machinery and equipment materials and materials used in uniforms and personal protective equipment (PPE) that DBI supplies to its employees as these sectors are known to be at risk of modern slavery.

DBI relies on its tier 1 suppliers to ensure that the tier 2 suppliers they engage are taking steps to manage and mitigate modern slavery risks in their supply chains, consistent with DBI's expectations.

DBI procures uniforms and PPE from an Australian-based apparel supplier who does not directly manufacture garments but rather engages other Australian based suppliers (i.e. tier 2 suppliers to DBI). As outlined in Table 1, the apparel supply industry was identified as having potential higher risks of modern slavery as part of DBI's risk assessment process, DBI requested its Apparel Supplier to complete DBI's Modern Slavery Due Diligence Questionnaire. Although no specific concerns of modern slavery were directly identified in the response to DBI's Modern Slavery Due Diligence Questionnaire and DBI's procurement spend is low, DBI engaged with the supplier directly to obtain further detail on its due diligence processes, especially in relation to tier 2 suppliers that source garments from overseas suppliers. Our Apparel Supplier has confirmed that it has processes in place to screen its suppliers for modern slavery risks, including a centralised team in place for the onboarding of suppliers. The Apparel Supplier requires its tier 2 suppliers to certify compliance with the Apparel Suppliers' policies, including its Ethical Sourcing Policy. If DBI's Apparel Supplier is unable to verify that its suppliers have appropriate policies and procedures in place to address modern slavery risks, the Apparel Supplier has advised that its policy requires that it cease trading with these suppliers.



#### 8. 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 in accordance with its Modern Slavery Policy and Framework.

#### **Governance**

More generally, 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 Corporate Governance Framework is designed to promote the responsible management and conduct of DBI including enabling the oversight of DBI's management of modern slavery risks.

Figure 2 – DBI's Corporate 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 Due Diligence and Risk Assessment
- Risk Management Manual
- DBT Sustainability Strategy

#### **Reporting and Oversight**

Modern Slavery reporting within DBI comprises reporting annually 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 periodically, as necessary with DBI's Risk Committee, the Compliance, Risk and Sustainability Committee and the DBI Board. In 2023, DBI did not receive any reports of concerns related to modern slavery practices either through DBI's Speak Up processes or in correspondence with DBI's senior executives or the Board.

#### **Due Diligence and Mitigating Strategies**

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

#### These include:

- Initial & Annual Vendor Risk Assessments: DBI undertakes vendor risk assessments to assess the nature and extent of any potential exposure to modern slavery risks in its vendors' operations and supply chains against the Modern Slavery Risk Factors. 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 Supplier Due Diligence 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. Further Vendor
  Due Diligence including the Modern Slavery Supplier Due Diligence Questionnaire will be
  required to be completed by vendors where modern slavery risks are identified based upon
  DBI's Initial or Ongoing Risk Assessments having regard to relevant spend and categories, in
  accordance with the Modern Slavery Policy and Framework.
- Ongoing vendor monitoring: All vendors (approximately 150 as at 31 December 2023) are subject to ongoing monitoring through an external compliance monitoring provider as part of the Initial Vendor Risk Assessment and Ongoing Vendor Risk Monitoring. All alerts are reviewed to determine if the vendor risk rating should change or further due diligence undertaken.
- **Contract Provisions**: All of DBI's standard form contracts contain clauses specifically addressing modern slavery and the standards which DBI expects suppliers to adhere to and entitle DBI to request information regarding due diligence or information relating to the supplier's operation or supply chains.
- 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.

#### **Modern Slavery Training**

DBI is committed to improving the capacity of our people to understand, identify and manage the risks of modern slavery in our operations and across our supply chain. Across the reporting period, DBI has again undertaken modern slavery awareness training, with 100% of DBI employees completing the online training module.



#### The training focused on:

- Defining modern slavery;
- Outlining the importance of being aware of modern slavery and human rights violations as a global citizen;
- Explaining why and how modern slavery occurs in supply chains and operations;
- Explaining how to comply with the requirements of the Australian modern slavery legislation;
- Outlining action taken to ensure transparency in supply chains and operations to investors and consumers; and
- Explaining the responsibilities as an employee and global citizen to take measures to prevent modern slavery and human rights violations.

Additionally, we delivered annual training to ensure our people understand DBI's Code of Conduct and the standards of behaviour that are acceptable at DBI. In 2023, 100% of employees<sup>3</sup> completed this training and completed an annual Code of Conduct Compliance Attestation.

# 9. Other Relevant Considerations – Shipping and Our Customers in Bowen Basin Coal Supply Chain

#### **Shipping and Logistics**

The Modern Slavery Act requires companies to consider modern slavery risks in their supply chains and operations. Whilst DBI recognises that modern slavery risks related to shipping activities are high, due to the lack of visibility, regulation and monitoring of working conditions on vessels, shipping and logistics associated with coal exported from DBT is not considered to be part of DBI's supply chain.

Rather, coal is sold by DBI's customers, the DBT Users who mine coal, to export customers. These export customers are responsible for contracting directly with the vessel operators for marine transportation to ports of destination.

Neither DBI or the independent DBT Operator has any contractual relationship with vessel owners or coal exporters to facilitate a direct ability to influence the modern slavery performance of vessel operators. However, the DBT Operator implements a 3-part vetting process for acceptance of vessels at DBT designed to ensure good operating practices of shippers:

- Vessels must meet Rightship's quality standards;
- Vessels must comply with the provisions of the Operator's Vetting Questionnaire;
- Vessel acceptance is also conditional upon previous satisfactory loading performance at DBT.

The RightShip Vetting system is an internationally recognised third party ESG focused digital maritime platform which assesses and certifies vessels against minimum requirements for good operational practices, including safety, risk, sustainability and social welfare standards<sup>4</sup>.

In addition, all vessels loading at Australian Ports (including at the Port of Hay Point, within which DBT is located) are regulated by the Australian Maritime Safety Authority (AMSA). AMSA administers compliance under Australian Laws with the ILO Maritime Labour Convention 2006 (to which Australia is a signatory) under maritime regulations governing the welfare of seafarers, complaints procedures and which empowers AMSA to inspect vessels, refuse access or grant conditional entry to Australian ports where ships are not operated to meet minimum working condition requirement on vessels<sup>5</sup>.

<sup>&</sup>lt;sup>3</sup> excluding unavailable employees due to extended leave

<sup>&</sup>lt;sup>4</sup> Please refer to https://rightship.com/technical-information?nid=91

<sup>&</sup>lt;sup>5</sup> Please refer to https://www.amsa.gov.au/vessels-operators/seafarer-safety/about-maritime-labour-convention-2006



North Queensland Bulk Ports Corporation Limited (NQBP) which is responsible for the operation of the Port of Hay Point reports that it recognises that its employees and in particular marine pilots, may be exposed to, may observe or be personally advised of modern slavery occurring on international vessels. Further, NQBP commits to reporting any incidents directly to AMSA who has jurisdiction to investigate welfare concerns pertaining to seafarers.<sup>6</sup>

DBI will continue to work with relevant stakeholders to monitor and report on modern slavery risks relating to shipping from DBT.

#### **Our Customers**

DBI's Users at DBT are cognisant of the modern slavery risks within their operations and supply chains with 67% of Users submitting modern slavery statements (representing approximately 91% of DBT Users by contracted tonnage<sup>7</sup>).

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

During the reporting period we continue to progress DBI's modern slavery initiatives as we continue to mature and enhance our response to modern slavery risks in DBI's operations and supply chain by:

Activity	2023 Status
Continuing to undertake the annual review of DBI's modern slavery risk assessment of its operations and supply chain.	Complete
Conducting an annual review of DBI's governance initiatives and Modern Slavery Policy and Framework to further integrate modern slavery risk assessment across DBI's operations and provide guidance about how DBI is to conduct its business to ensure the risks of modern slavery are minimised. In 2023, this included DBI's annual review of its Code of Conduct and Speak Out Policy.	Complete
Undertaking compulsory annual modern slavery awareness training for all staff. In 2023, DBI had a 100% completion rate.	Complete
Undertaking compulsory annual Code of Conduct training and compliance certification for all staff. In 2023, DBI had a 100% completion rate for staff <sup>8</sup> .	Complete
Review and update of DBI's Procurement Policy and Framework ensuring modern slavery considerations are taken into account when undertaking certain procurement activities.	Complete
Continuing to assess new suppliers through DBI's onboarding processes and ongoing screening of existing vendors.	Ongoing
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.	Ongoing
Reporting provided as required under its Modern Slavery Policy and Framework to DBI's Management, Compliance, Risk and Sustainability Committee and the DBI	Ongoing

<sup>&</sup>lt;sup>6</sup> Please refer to North Queensland Bulk Ports Corporation Limited's most recent modern slavery statement: https://modernslaveryregister.gov.au/statements/10698/

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<sup>&</sup>lt;sup>7</sup> As at 31 December 2022 based upon annualised contracted tonnage

<sup>&</sup>lt;sup>8</sup> excluding unavailable employees due to extended leave



Activity	2023 Status
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:

Activity	Status
Undertaking an external review of the effectiveness of DBI's supply chain risk assessments in the initial reporting periods.	Complete
Taking steps to Identify, assess and start to address (where applicable) risks identified in prioritised 2023 supplier's review.	Ongoing
Reviewing prospective suppliers for all substantial Non-Expansionary Capital Expenditure Projects for modern slavery risks at the tender phase and requiring completion of DBI's Modern Slavery Due Diligence Questionnaire reflecting the potential exposure of these suppliers to the Modern Slavery Risk Factors in the Machinery and Equipment and the Construction and Maintenance industries.	Ongoing
Continuing to monitor DBI's performance in responding to potential modern slavery risks and the effectiveness of its actions.	Ongoing
Continuing to consider new and existing policies and procedures for further opportunities to embed modern slavery risk considerations.	Ongoing
Incorporating a review of DBI's modern slavery framework within DBI's Internal Audit Program.	Scheduled
Continued ongoing 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.	Ongoing

#### 11. 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. In addition 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, who are common directors of DBI's subsidiaries.

**Board Approval** 

This statement was approved by the Board of Dalrymple Bay Infrastructure Limited on 20 June 2024.

Hon. Dr David Hamill AM

Chairman

Dalrymple Bay Infrastructure Limited

25 June 2024



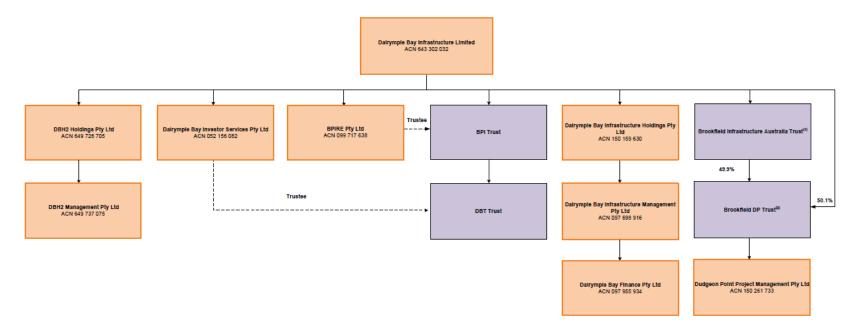
## Annexure 1 Corporate Structure - DBI Group

#### **Dalrymple Bay Infrastructure Holding Structure**

As of 3 January 2023



NB: All Interects are 100% unless otherwise specified



<sup>(1)</sup> 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.