



TT-Line Company Pty Ltd

Modern Slavery Statement

1 July 2024 to 30 June 2025



**SPIRIT of
TASMANIA**

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MODERN SLAVERY STATEMENT 2024/2025 – TT-LINE COMPANY PTY LTD

Introduction

This Modern Slavery Statement is for TT-Line Company Pty Ltd (ABN 39 061 996 174) (**TT-Line**). TT-Line owns and operates the Spirit of Tasmania I and Spirit of Tasmania II vessels which provide daily passenger and freight transportation services between Devonport in Tasmania and Geelong in Victoria.

Modern Slavery is a severe form of exploitation of individuals for the purpose of personal or commercial gain and is prohibited under Article 4 of the UN Declaration of Human Rights. The *Modern Slavery Act 2018* (Cth) (the **Act**) identifies eight serious forms of modern slavery: trafficking in persons; slavery, servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services.

TT-Line fully supports the aims and objectives of the Act. TT-Line is committed to preventing modern slavery in its operations and supply chains.

In its sixth Modern Slavery Statement, TT-Line reports on its reasonable endeavours to meet its continuous improvement obligations to understand, identify and address the risk of modern slavery in its operations and supply chains. A summary of TT-Line's responses to each of the mandatory criteria in the Act is included in Appendix A of this statement.

TT-Line is always looking at ways to improve its response to modern slavery and this fifth statement continues to build upon the information provided in its fourth statement for the 2022-2023 financial year.

This Modern Slavery Statement has been prepared in consultation with the TT-Line Leadership Team and has been approved by the Board of Directors of TT-Line.



Ken Kanofksi

Chair



About TT-Line

Company vision

TT-Line's vision is to deliver an unparalleled and unique sea transport service across Bass Strait.

Company mission

TT-Line's mission is to provide a commercially sustainable ferry service built on a reputation for excellence in safety, reliability and exceptional passenger and freight services.

Business objectives

TT-Line manages and facilitates the operation of a shipping service to and from Tasmania in a manner that is consistent with sound commercial practice.

TT-Line endeavours to do this through the provision of passenger and freight services on the Devonport to Geelong Bass Strait route and through the operation of the Edgewater Hotel in Devonport.

Approach to modern slavery

TT-Line prides itself on ensuring a safe environment for its passengers, employees, and contractors.

TT-Line ensures compliance with applicable legislative obligations including, but not limited to, those relating to governance, work health and safety, environment, and industrial relations obligations.

In drafting this Statement, TT-Line has taken into account the intention of the Act and the mandatory criteria for Modern Slavery Statements. To that end, TT-Line is taking a proactive approach where it considers appropriate to meet the expectations of the legislation to identify, address and prevent modern slavery risks across its operations and supply chains.

Structure, operations, and supply chains

Structure

TT-Line is a State-owned corporation formed under the *TT-Line Arrangements Act 1993 (Tas)* (the **TTLA Act**) and is registered in Devonport, Tasmania.

TT-Line is a reporting entity under the Act as its annual consolidated revenue exceeded \$100 million in the 2024/2025 reporting period. TT-Line is a financial year reporting entity in accordance with the *Income Tax Assessment Act 1997 (Cth)*.

At the end of this reporting period, TT-Line has two Shareholder Ministers – the Honourable Guy Barnett MP as Treasurer and the Honourable Eric Abetz MP as Minister for Transport being the Shareholder Ministers required under the TTLA Act. The Directors of TT-Line are appointed by the Shareholder Ministers.

During this reporting period, TT-Line owned and operated the Spirit of Tasmania I and Spirit of Tasmania II vessels and the Edgewater Hotel in Devonport. The Edgewater Hotel was sold in early July 2024.

During the reporting period, TT-Line owned several business names including Spirit of Tasmania, Edgewater Hotel and Edgewater Motor Inn. TT-Line does not own or control any other entities. Accordingly, TT-Line is the only entity covered by this statement.

During the reporting period TT-Line operated its business in Tasmania and Victoria and has offices in Devonport, Geelong, and a temporary office Melbourne. TT-Line has approximately 502 employees. TT-Line closed its temporary Melbourne office in August 2024.

At the beginning of the reporting period, TT-Line's internal organisational structure was made up of:

- The Leadership Team comprising:
 - the Chief Executive Officer (CEO);
 - the Chief Financial Officer (CFO);
 - the Chief Operations Officer (COO);
 - the GM Freight Services (GMFS);
 - the GM Human Resources (GMHR);
 - the Chief Information Officer (CIO);

- the GM Marine Operations (GMMO);
 - the GM Marketing (GMM);
 - the GM Passenger Sales (GMPS);
 - the GM Port Operations (GMPO);
 - the GM Retail and Hospitality (GMRH); and
 - the General Counsel/Company Secretary (GC/CS).
- with
- The CFO, COO and GC/CS reporting to the CEO; and
 - The GMFS, GMHR, CIO, GMMO, GMPO, GMM, GMRH and GMPS reporting to the COO;
- The COO role ceased in July 2024 and the COO reports all reverted to reporting to the CEO;
 - The individual GMM role ceased in July and the GMM and GMPS roles were merged to GM Passenger Sales and Marketing (GMPSM) reporting to the CEO;
 - Finance and Commercial Team (reporting to the CFO);
 - Freight Services team (reporting to the GMFS);
 - Human Resources Team (reporting to the GMHR);
 - Information Services Team (reporting to the CIO);
 - Marine Operations Team (reporting to the GMMO);
 - Marketing Team (reporting to the GMM);
 - Passenger Sales Team (reporting to the GMPS);
 - Port Operations Team (reporting to the GMPO); and
 - Retail and Hospitality Team (reporting to the GMRH).

TT-Line's GC/CS monitors compliance with TT-Line's Modern Slavery Policy and relevant audit procedures, and their effectiveness on modern slavery prevention, on an annual basis.

Operations

The principal activities of TT-Line are providing commercial passenger, vehicle and freight shipping services between Tasmania and mainland Australia.

The core business of TT-Line is to:

- provide passenger and passenger vehicle ferry services across Bass Strait; and
- provide a freight shipping service across Bass Strait.

TT-Line's main operations as part of this business include:

- food and beverage;
- retail; and
- accommodation (both on board the Spirit of Tasmania vessels and in the Edgewater Hotel).

Supply chains

TT-Line supply chains involve various suppliers and contractors, primarily from within Australia.

TT-Line procures and outsources:

- goods (including, but not limited to, fuel, food and beverages, plant and equipment, lifesaving equipment, accommodation supplies, office supplies, uniforms, and tourism souvenirs); and
- services (including, but not limited to, services in relation to security, stevedoring, freight, media, marketing, tourism, sponsorship, IT, maintenance, cleaning, hospitality),

from within and outside Australia.

TT-Line enters into agreements and contracts (both short and long term) with suppliers and contractors across a variety of sectors (including, accommodation, retail and hospitality, travel, transport, marketing, media, and infrastructure and maintenance).

TT-Line's suppliers and contractors in turn can engage third party suppliers and subcontractors to assist in providing goods and services to TT-Line.

Procurement breakdown in 2024/2025

During 2024/2025, TT-Line's most significant expenditure was marine fuel and oil, followed by terminal operations, administration, customer acquisition (marketing), repairs and maintenance, consumables, security and food and beverages.

An outline of the breakdown of this expenditure is set out below.

Procurement methods

TT-Line's Procurement Policy establishes internal requirements for the acquisition of goods, services, or capital items and, wherever possible, supporting Tasmanian business.

Procurement is undertaken in a way that is consistent with the general principles of value for money, open and effective competition, ethical conduct in purchasing as well as enhancing opportunities for Tasmanian businesses in accordance with the Buy Local Guidelines for Tasmanian Government Businesses.

In 2024/2025, % of TT-Line's purchases were from Tasmanian businesses, up % on the previous reporting periods results. The dollar value for purchases from Tasmanian companies totalled \$ million. TT-Line ensures that its operations, management, and staff are based within Tasmania to the maximum extent possible where consistent with the effective operation of the business, due to the nature of the maritime industry however, not all supplies (including fuel and spares for the vessels) are available for purchase in Tasmania.

All TT-Line's purchasing is undertaken in a fair and unbiased way in accordance with applicable legislation and TT-Line's internal policies. This includes:

- TT-Line buyers being fully accountable for the purchasing practices used and the decisions made;
- adhering to TT-Line's Code of Conduct and Ethics Policy;
- adhering to TT-Line's Modern Slavery Policy;
- identifying, dealing with, and documenting issues relating to actual or perceived conflicts of interest; and
- maintaining confidentiality.

Governance and policy framework

In addition to TT-Line's Procurement Policy, TT-Line's corporate governance framework includes policies and procedures that are relevant to modern slavery. In particular, the Modern Slavery Policy aims to minimise modern slavery risks and provide information and guidance to TT-Line employees, consultants, and contractors on how to recognise and deal with modern slavery issues.

These policies and procedures include:

- Modern Slavery Policy;
- Procurement Policy
- Public Interest Disclosure Policy and Procedure;
- Whistleblowing Policy;
- Appropriate Workplace Behaviour Policy;
- Code of Conduct and Ethics Policy;
- Grievance Policy; and
- Privacy Policy.

These documents should be referred to in conjunction with this statement and are available on TT-Line's intranet for access by all staff.

All policies listed above apply to TT-Line's employees, contractors, consultants and external service providers and any other person who conducts work in any capacity for TT-Line. These policies outline the standards of personal and corporate conduct that TT-Line expects of all people working with TT-Line.

TT-Line ensures that compliance with these policies is a requirement under all TT-Line employment contracts and part of the induction process as relevant for new employees and contractors. TT-Line also endeavours to make compliance with these TT-Line policies a condition of all supply contracts.

Modern slavery risks in operations and supply chains

Scope of review

During 2024/2025, TT-Line conducted assessments into the modern slavery risks across relevant industry sectors where it was considered appropriate. As an Australian company with several policies and procedures in place to address modern slavery and related issues, TT-Line considers the risk of modern slavery in its direct operations to be very low. However, as previously noted TT-Line acknowledges that it may be exposed to modern slavery risks through its supply chains.

In this reporting period, based on the assessment of the risk of modern slavery contraventions by its suppliers, TT-Line continued to distribute its modern slavery questionnaires and Modern Slavery Policy to new suppliers where considered appropriate to gain further insight into its supply chains.

TT-Line received completed questionnaires from 18 additional suppliers during the 2024/2025 financial year and has analysed these responses to determine any necessary actions to address modern slavery risks. This makes a total of 64 individual company questionnaires received over the past three reporting periods reflecting an increase in compliance monitoring of its supply chain by TT-Line. Some existing suppliers were also required to provide responses to the questionnaires pursuant to their existing contracts of supply. The conclusion of the assessment was that all of these suppliers are considered very low risk.

During the current reporting period, TT-Line has also reviewed the Modern Slavery Statements of each of its key suppliers that have published statements. While TT-Line's due diligence has not identified any known instances of modern slavery, TT-Line acknowledges that managing modern slavery risks requires ongoing commitment.

As with previous Statements, when conducting risk assessments into its operations and supply chains, TT-Line referenced tools such as the latest versions of the *Global Slavery Index*¹, as well as the due diligence and remediation recommendations in the *United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles)*².

Also consistent with our previous Statements, TT-Line's focus in this reporting period has again been to endeavour to conduct further assessment of the nature, context, and extent of modern slavery risks in its operations and supply chains where appropriate. Consistent with previous years, in preparing this Modern Slavery Statement for the 2024/2025 reporting period, TT-Line has sought to conduct risk assessments for sectors identified as higher risk and where possible has sought to demonstrate a continuous improvement approach by also assessing other sectors where such an approach was considered appropriate in the circumstances.

Maritime-Specific Modern Slavery Risks

As a domestic ferry operator, TT-Line's risk profile differs significantly from international shipping operations. Key maritime-specific considerations include:

(a) Seafarer employment practices

All maritime staff (Masters, officers, marine engineers, and crew) are directly employed by TT-Line from the local labour markets or through Australian based professional services providers (e.g. ASP). All employees are subject to Australian Maritime Safety Authority (AMSA) certification requirements and Australian employment law protections through common law contracts or a negotiated Enterprise Agreement. Both Spirit of Tasmania I and II are Australian-flagged vessels operating under Australian jurisdiction, eliminating flag-of-convenience risks common in international shipping.

(b) Port and terminal operations

Stevedoring and terminal services in Devonport and Geelong involve casual and shift work patterns that warrant monitoring. While TT-Line does not directly employ stevedores, the company engages terminal operators whose practices are addressed separately in this statement. Enhanced focus is maintained on working conditions, wage compliance, and labour hire practices in this sector.

¹ Global Slavery Index 2023

² United Nations Guiding Principles on Business and Human Rights 2011

(c) **Vessel supply and maintenance**

Ship chandlery, provisions, and maintenance services are sourced predominantly from Australian suppliers where possible. Maintenance contractors and marine engineers operating in Australian ports are subject to local regulatory oversight and ongoing monitoring through TT-Line's contractor questionnaire process.

Comparative advantage

TT-Line's domestic operating model and employment approach eliminates the most significant modern slavery risks typically associated with international maritime operations, including exploitation of foreign seafarers through recruitment agencies, substandard working conditions on vessels flagged in jurisdictions with weak labour protections, debt bondage of crew members recruited from developing countries, and extended periods at sea without shore leave or access to grievance mechanisms.

Risk Level Assessment

In assessing the risk level of different suppliers and contractors, TT-Line considered such factors highlighted in guidance documentation from the Australian Government³ as:

- the type of industry and sector the goods and services are procured from;
- the countries the goods and services from the sector are sourced from;
- the sectors in which there is not clear visibility over sub-contracting arrangements; and
- goods and services that are deemed to be higher risk.

To avoid unnecessary repetition, this statement does not restate the modern slavery risks identified in detail in TT-Line's previous Statements. However, the Statement does address any historical potential issues previously identified and how these have been managed through TT-Line's normal due diligence processes.

Cleaning

TT-Line has taken reasonable measures to ensure that its cleaning services are not impacted by modern slavery and as reported. From the perspective of laundry services, TT-Line has considered the modern slavery risks from its laundry provider, a Tasmanian based company with Australian based suppliers and subcontractors. TT-Line considers that this provider continues to present a low risk of modern slavery. No reports or concerns raised regarding modern slavery in their operations regarding this company were received during the reporting period.

TT-Line vessels are cleaned by employees engaged through a national cleaning company. Consistent with TT-Line's Modern Slavery Policy this service provider was again required to complete the Modern Slavery Questionnaire regarding their practices during the 2024/25 financial year. No reports or concerns raised regarding modern slavery in their operations regarding this company were identified in the questionnaire or otherwise received during the reporting period.

The service provider is required to publish its own Modern Slavery Statement and reports on its own compliance with the *Modern Slavery Act* (2018) approved by its Board annually. In its fourth Modern Slavery Statement in December 2024 the company's Board recognised the importance of identifying and managing the risk of modern slavery in its operations and supply chain.

Waste Management

TT-Line continues to engage a sole waste management provider. This provider is a national company and is a reporting entity under the Act. TT-Line has not received any reports of or had any concerns raised regarding modern slavery in any of its operations or supply chains. 99.2% of this provider's active suppliers continue to operate from Australia or New Zealand with less than 0.8% in Europe and North America and less than 0.1% in the rest of the world. In its 2024 Modern Slavery Statement, the company noted it has a zero tolerance approach to modern slavery and the conditions that enable it and has developed an anti-slavery strategy which supports its commitment.

On that basis, TT-Line continues to hold the reasonable belief that modern slavery is not present in its cleaning or waste management operations or supply chains.

³ Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities May 2023.

Maintenance

While TT-Line's primary facilities maintenance supplier is not a reporting entity under the Act, it has developed a statement to recognise the responsibility for all employers to have an understanding and prevent slavery and human trafficking which it has promoted internally. The company is Tasmanian owned and operated and uses a very limited supply chain in providing its services to TT-Line.

Terminal 3 Construction Project

The construction of Terminal 3 at the Port of Devonport involves complex supply chains across construction materials, labour hire, and specialised maritime infrastructure. TT-Line has assessed modern slavery risks through direct engagement with principal contractor BMD and project director AAP Group to verify their Modern Slavery Statements and policies, contractual requirements for both entities to flow-down modern slavery obligations to subcontractors, and quarterly project meetings including discussion of workforce composition and any labour concerns.

Key findings from 2024/25:

(a) *BMD - Principal Contractor*

BMD is the contractor responsible for the construction of Terminal 3 at the Port of Devonport. In its 2024 Modern Slavery Statement the company noted it seeks compliance with modern slavery legislation from suppliers through acceptance of the terms and conditions included within supplier, contractor and/or consultancy agreements, and via the raising of purchase orders. It also acknowledged that, because of the nature of the business and its procurement processes, the risk of modern slavery within its supply chains is low there continues a need for it to be monitored and managed consistent with the obligations under the Modern Slavery legislation. It continues to assess the effectiveness of the controls it has in place to ensure that potential risks of modern slavery occurring within any of its suppliers operations are promptly addressed and managed.

On that basis, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

(b) *AAP Group - Project Director*

The AAP Group recognises in its latest Modern Slavery Statement that while the risk of modern slavery in its supply chain is low, risks can increase where services are provided by low skilled workers, such as cleaners, or where they are delivered in an offshore jurisdiction with higher underlying risk and it focuses its risk mitigations in such areas where they arise.

Its Modern Slavery Policy outlines the company's commitment to the eradication of modern slavery and its reporting and other legal obligations under the *Modern Slavery Act 2018*. The policy is aligned with its Modern Slavery Statement and further details its commitment to managing all aspects of its operations and supply chains in pursuit of the eradication of all forms of modern slavery including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage.

On that basis, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

Vessel Replacement

In the 2021/2022 reporting period, TT-Line commenced construction of two new ships to replace the current Spirit of Tasmania vessels. The shipbuilder is a Finnish company which adheres to international norms and agreements on human rights, employment rights, the environment, and anti-corruption including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights.

TT-Line continued to negotiate for up to \$100 million worth of local (Tasmanian/Australian) content to be included in the build. To facilitate the procurement of local materials and content and to manage the procurement, TT-Line employed a Tasmanian based Procurement Manager, who was the representative of the shipyard in Finland in relation to both the procurement of local materials and content, timing, quality, and logistics of the delivery of these materials. While TT-Line does not have direct visibility of the company's supply chain, the Procurement Manager continued to assist in assessing and addressing any identified modern slavery risks.

As previously reported, procurement for the vessel replacement project is a combination of services provided and goods sourced by the shipbuilder and goods sourced by TT-Line for inclusion in the manufacture.

RMC have a strict core ethical rules and principles policy that applies to all employees and contractors and requires each contractor to sign a declaration that it will comply with all local rules and laws and follow internationally acceptable ethical standards in the procurement of goods and services.

RMC previously completed a questionnaire during the 2022/2023 reporting period and was again required to complete a Modern Slavery questionnaire during the 2024/2025 reporting period. Based on the response in the questionnaire and the strict human rights framework under which the shipbuilder must operate in the EU and TT-Line's own procurement strategies and obligations under the Act, TT-Line is of the view the risk of modern slavery contraventions by the company is very low.

Geelong Port

TT-Line's passenger and freight terminal at Corio Quay, Geelong, is leased from GeelongPort Pty Ltd, (**GeelongPort**) GeelongPort have in place their own zero tolerance Modern Slavery Policy outlining its approach to all forms of modern slavery within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships.

GeelongPort is committed to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains..

On that basis, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

Food and beverage products

TT-Line continues to engage with the same seafood and food product suppliers as in the previous reporting periods. TT-Line's risk assessment prioritises seafood products (prawns, fish) as higher risk due to documented forced labour in global fishing industries, with suppliers required to demonstrate Australian sourcing or certification from sustainable fisheries with independent social audits; fresh produce and seasonal agricultural products assessed for labour hire practices, with preference given to suppliers with Sedex membership or equivalent ethical trading certification; and any imported specialty food items from countries identified as higher risk in the Global Slavery Index, which require enhanced due diligence including third-party audit verification.

Accordingly, TT-Line continues to monitor one of its major international food suppliers to audit its progress in remediating modern slavery issues in its supply chains. TT-Line regularly engages with this supplier to ensure it is maintaining its approach to addressing modern slavery challenges. The supplier publishes its own Australian Modern Slavery Statement annually. The supplier also includes a "*Respecting and Promoting Human Rights*" section in its annual Sustainability Report which it publishes on its company web site and have recently released its Human Rights Roadmap and Framework.

The supplier was required to complete a TT-Line Questionnaire during the current reporting period and based on the companies human rights policies and the responses in the questionnaire TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains,

A Tasmanian supplier with relevant policies including a Human Rights Statement, Anti Bribery Corruption and Fraud Policy, and Whistleblower Policy is another major supplier for TT-Line. During the reporting period it was confirmed that the supplier is still a member of Sedex, a membership organisation that provides a platform for companies to manage and improve working conditions in global supply chains. The supplier is externally audited through the Sedex SMETA (**Sedex Members Ethical Trade Audit**) program. All the supplier's subcontractors operate in Australia, and it has undertaken a supply chain risk assessment for forced/bonded/trafficked labour and the subcontractors have been independently audited and approved by either SMETA or BSCI (**Business Social Compliance Initiative**). The supplier confirmed during the reporting period to the best of its knowledge that its risk of modern slavery is very low and remains committed to helping its supply chain to mitigate any risks. The supplier was also required to complete a TT-Line Questionnaire during the current reporting period and based on the companies human rights policies, its SMETA audit and the responses in the questionnaire TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains,.

TT-Line's major beverage supplier, a Tasmanian based company, is not required to comply with the obligations under the Modern Slavery Act. The supplier was required to complete a TT-Line Questionnaire during the current reporting period however. The company confirmed through its responses to the questionnaire that during the 2024/25 reporting period it is not aware of any modern slavery in its operations or supply chains and, while TT-Line acknowledges that the use of unskilled, temporary, or seasonal workers is a potential indicator of modern slavery risk⁴, TT-Line is of the informed view that the risk of modern slavery practices at the company is very low.

TT-Line's risk assessment for the 2024–2025 period also included the Edgewater Hotel for the months it was owned. Despite the higher inherent risk in the hospitality sector, the Hotel's reliance on directly employed, Tasmanian-based staff mitigated the operational risk to very low.

Souvenirs and tourism items

TT-Line continues to monitor its relationship with its supplier of souvenirs and tourism items sourced from an Australian company with suppliers throughout China, Hong Kong, India, and Taiwan. The company has advised TT-Line it continues to review its relationships with product suppliers. TT-Line minimises the risk of modern slavery events in this supply chain by dealing with a single Australian based supplier who is experienced with and understands TT-Line's obligations regarding modern slavery. The supplier was not required to complete a Modern Slavery Questionnaire during this reporting period however TT-Line will continue to work with this supplier to assess and prevent the risk of modern slavery in its supply chains where appropriate as the proposed contractor KPIs are implemented during the next reporting period in 2025-2026.

Fuel and oil

TT-Line's supplier of fuel to the vessels in Geelong is a reporting entity and has published its own Modern Slavery Statement current for the 2023-24 reporting period. The supplier's risk assessment into modern slavery during the 2022-23 period found that 33 out of 101 of the company's key suppliers who responded to their Modern Slavery Questionnaire raised flags for follow up on their potential modern slavery risk. The company completed a detailed review to better understand the modern slavery risks posed by those 33 suppliers and concluded that none of the suppliers were considered to be a Modern Slavery risk. Consistent with this conclusion, in 2024, the company did not identify any actual instances or allegations of modern slavery within its direct operations, and it did not become aware of any modern slavery allegations against any supplier.

On that basis, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

TT-Line continues to engage a Victorian diesel fuel injection service, repair, and parts solution provider. The provider remains ISO certified and has control measures to address modern slavery risks and is not aware of any instance of modern slavery in its operations or supply chain. Compliance with modern slavery policies and procedures in that company is monitored by an ISO Manager and senior management participates in enforcing modern slavery policies and procedures. The provider has a Modern Slavery Policy, and any breach of the policy would lead to disciplinary action in accordance with the company's Disciplinary Procedure.

On that basis, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

Security

TT-Line continues to engage the same security services provided as discussed in all previous Modern Slavery Statements. As previously noted, the security services provider is not a reporting entity under the Modern Slavery Act but has a Human Rights Policy addressing modern slavery. The provider's Human Rights Policy addresses the actions it takes to address human rights issues including both internal and external reporting processes for employees, contractors, and/or members of the public to report any circumstances or action that violates or appears to violate its Human Rights Policy. The provider was required to complete a TT-Line Modern Slavery Questionnaire during this current reporting period.

Based on the results of the questionnaire and the adherence to its Human Rights Policy, TT-Line holds the reasonable belief that modern slavery is not present in the company or its supply chains.

⁴ Commonwealth *Modern Slavery Act 2018* – Guidance for reporting entities, page 80.

Planned Improvement of Risk Monitoring for 2025–2026

TT-Line recognises that while current supplier questionnaires provide a valuable foundation for identifying risk, they are not a complete measure of performance improvement over time. During the 2025–2026 reporting period, TT-Line intends to introduce a structured set of modern slavery performance indicators for its highest-risk suppliers (including cleaning, catering and hospitality contractors).

These indicators will be informed by the findings of the 2024–2025 Modern Slavery Questionnaire responses, and will focus on:

- the existence and updating of supplier modern slavery or human rights policies;
- training completion rates for contractor staff; and
- evidence of supplier review of labour hire and subcontracting practices.

These KPIs will be developed collaboratively with contractors to ensure that they are practical, transparent, and aligned with TT-Line’s continuous improvement obligations under the Modern Slavery Act.

Actions to assess and address modern slavery risks.

TT-Line has sought to take meaningful steps to identify and respond to modern slavery risks in its operations and supply chains.

In this Modern Slavery Statement, TT-Line has continued to build on the improvement during the previous three years wherever possible.

TT-Line primarily addresses the risks of modern slavery practices occurring in its operations and supply chains through strict procurement and operational procedures. To ensure TT-Line is aware of and manages modern slavery risks, TT-Line has:

- issued a due diligence questionnaire to key suppliers and contractors and reviewed and evaluated the responses it has received to date and will continue to undertake this process for any newly engaged suppliers as procurement increases with new projects where appropriate based on a modern slavery risk assessment of the supplier;
- where a supplier is contracted for a term greater than 12 months, they are required to complete a questionnaire at least bi-annually or when otherwise requested by TT-Line to ensure continual monitoring for compliance with TT-Line’s modern slavery framework;
- conducted further due diligence on key suppliers and contractors by examining Modern Slavery Statements and policies of those suppliers and contractors where appropriate;
- ensured that modern slavery is addressed as part of all tender processes irrespective of the size of the tender;
- built upon the work undertaken in the previous reporting period to conduct risk assessments of higher risk sectors and to also assess sectors not considered to be higher risk;
- worked to ensure that staff are aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms, with a particular focus on educating the procurement team;
- included its modern slavery clause in all supplier contracts as noted above. The clause requires suppliers to:
 - comply with all applicable modern slavery laws and TT-Line’s Modern Slavery Policy and agree that non-compliance is a basis for contract termination;
 - insert modern slavery clauses into contracts with their suppliers and subcontractors;
 - report to TT-Line as soon as they become aware of any breach, or potential breach, or any actual or suspected modern slavery in a supply chain which has a connection with a TT-Line contract;
 - provide a report to TT-Line each year if requested by TT-Line taking a risk-based approach setting out the steps it has taken to ensure that modern slavery is not taking place in any of its supply chains or any part of its business;
- used its best endeavours to make stakeholders aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms;

- continued ongoing engagement with contractors and suppliers to better understand potential risks of modern slavery in operations and supply chains; and
- worked with direct suppliers to improve their awareness of modern slavery risks and how they may contribute to modern slavery.

Planned Development of Contractor KPIs

In recognition of the need for measurable improvement, during 2024–2025, TT-Line commenced work on the contractor-focused Modern Slavery KPI Framework. This development phase included finalising the metrics informed by the 2024–2025 Questionnaire responses, ready for pilot implementation in 2025–2026. The framework will:

- build upon the data collected through the 2024–2025 Modern Slavery Questionnaire;
- establish consistent measures for supplier progress in areas such as policy adoption, training, and supply chain transparency; and
- be introduced through engagement with priority suppliers to ensure a collaborative approach to compliance and capability-building.

This framework will enhance the effectiveness of TT-Line's supplier engagement by providing a basis for tracking progress over time rather than relying solely on periodic questionnaire responses.

Questionnaire Response Analysis and Follow-Up

TT-Line's Modern Slavery Questionnaire comprises 24 questions across six categories: Structure, Policies, Relationships, Goods and Services, Compliance, and Training. Under the enhanced governance framework responses will trigger a three-tier risk assessment:

- **Green (low risk):** Suppliers with established modern slavery policies, regular training programs, and transparent supply chains require annual questionnaire renewal.
- **Amber (medium risk):** Suppliers with developing frameworks or limited visibility of sub-tier suppliers require bi-annual questionnaire completion plus engagement sessions to build capability and improve risk management practices.
- **Red (high risk):** Suppliers with significant policy gaps, no training programs, or high-risk country sourcing without mitigation measures require quarterly monitoring, mandatory remediation plans with clear timelines, and escalation to the Leadership Team for review.

During 2024/25, all 18 suppliers completing questionnaires were classified as low risk (green), with strong policy frameworks and proactive approaches to modern slavery prevention. This risk-based approach ensures TT-Line's resources focus on highest-impact interventions while supporting supplier capability development where needed.

Grievances and Remediation Processes

TT-Line has policies in place to provide employees and contractors with avenues to report any concerns regarding conduct.

These include the:

- Grievance Policy;
- Whistleblowing Policy;
- Public Interest Disclosure Policy;
- Code of Conduct and Ethics Policy; and
- Appropriate Workplace Behaviour Policy.

These policies also apply to modern slavery. Specifically, the Modern Slavery Policy provides that TT-Line will assess and investigate any disclosure in relation to modern slavery as it deems appropriate:

- in accordance with its current policies;
- by seeking third party support; and
- by reporting any suspected situations of modern slavery to the Australian Federal Police.

If a breach of the Modern Slavery Policy is identified, TT-Line may take other action as appropriate for the breach such as:

- assisting with remediation where harm or non-compliance is identified;
- issuing formal apologies;
- stopping certain activities or terminating a contract; or
- taking disciplinary action in accordance with its disciplinary procedures.

Measuring the effectiveness of actions

TT-Line acknowledges that it is essential to ensure its actions to assess and address modern slavery risks are effective and demonstrable through measurable outcomes.

During the 2024-25 reporting period, TT-Line monitored effectiveness through the following measures:

- Review of all contracts executed during the reporting period by the GC/CS to verify inclusion of modern slavery clauses prior to contract execution (100% inclusion for contracts >\$25,000);
- Tracking of Modern Slavery Questionnaire completion rates, with 18 additional questionnaires completed during 2024-25 (total of 64 questionnaires completed across three reporting periods, representing increased coverage of TT-Line's supply chain);
- Monitoring of supplier compliance through the Contract Lifecycle Management (CLM) Platform, including automated alerts for questionnaire completion requirements;
- Zero reported instances of modern slavery identified through supplier questionnaires, audit findings, or grievance mechanisms during the reporting period;
- Completion of training programs for procurement and management staff as detailed in the Continuous Improvement section of this statement.

For example, the effectiveness of our supplier due diligence in 2024–2025 was monitored through the following data points collected from the 18 additional suppliers who completed the questionnaire:

- 100% of respondents confirmed they agree to comply with TT-Line's Modern Slavery Policy.
- 90% of respondents confirmed they have a whistleblowing policy in place

TT-Line acknowledges that further progress is needed to move from qualitative assessments to more outcome-based measurement.

To support the need for the Company to move from qualitative assessments to more outcome-based measurement, TT-Line has commenced work on developing a Modern Slavery Monitoring and Evaluation Framework, including contractor performance indicators (KPIs), which will be piloted in the 2025–2026 reporting period.

These indicators are expected to measure areas such as:

- supplier training participation;
- supplier completion of workforce and subcontracting disclosures; and
- timely implementation of corrective actions.

The establishment of these indicators will allow TT-Line to report more tangible progress in subsequent statements.

The General Counsel will oversee implementation of the KPI framework, with data collection integrated into existing procurement and compliance systems. Quarterly progress reports will be provided to the Leadership Team, with bi-annual reporting to the Board.

TT-Line's 2025-26 Modern Slavery Statement will report performance against each KPI, including baseline data, targets, results achieved, and year-over-year improvement. This framework will enable TT-Line to demonstrate measurable progress in preventing modern slavery and create accountability for continuous improvement.

The General Counsel is responsible for the management of the Modern Slavery Policy and monitors the policy and audit procedures where appropriate on an annual basis. The comprehensive KPI framework will enhance this oversight by providing quantitative and qualitative measures of program effectiveness.

Continuous improvement

TT-Line's modern slavery program continues to evolve in line with the principles of continuous improvement under the Modern Slavery Act.

During the 2024–2025 reporting period, TT-Line focused on consolidating its supplier due diligence and analysing the outcomes of the 2024–2025 Modern Slavery Questionnaire to inform the next phase of its modern slavery strategy.



As part of this process, TT-Line dedicated resources and finalised the content and structure of the enhanced training module in 2024–2025, ensuring it provides detailed guidance on identifying indicators, escalating concerns, and understanding contractual obligations, with a launch scheduled for the 2025–2026 period. for employees and key contractors. The updated module will provide more detailed guidance on identifying potential modern slavery indicators within supply chains, escalating concerns, and understanding contractual obligations under the Modern Slavery Act. This enhancement will ensure that TT-Line’s staff and suppliers are equipped to meet the company’s evolving compliance and reporting expectations during the current reporting period.

Looking ahead, TT-Line will:

- introduce a structured set of modern slavery KPIs for high-risk contractors (including cleaning, catering and hospitality providers) during the 2025–2026 reporting period;
- conduct supplier engagement sessions to explain these expectations and support suppliers in meeting them; and
- integrate KPI reporting and training completion data into its annual supplier review cycle.

These initiatives collectively strengthen TT-Line’s approach to identifying, managing, and mitigating modern slavery risks, while promoting sustained improvement across its operations and supply chains.

Appendix A: Addressing the mandatory reporting criteria.

Mandatory criteria	Page number/s
Identify the reporting entity.	5
Describe the reporting entity's structure, operations, and supply chains.	5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8
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.	13
Describe how the reporting entity assesses the effectiveness of these actions.	15
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).	TT-Line does not own or control any other entities.