

# MODERN SLAVERY STATEMENT

2024 - 2025



## **ACKNOWLEDGEMENT OF COUNTRY**

The Port of Townsville Limited acknowledges the Wulgurukaba people as the traditional Custodians of Gurambilbarra, the Country on which the Port of Townsville operates.

'Wulgurukaba' means 'canoe people', a name that underscores their connection to the sea, rivers and waterways of our region. It is a connection that we share and hope to strengthen in generations to come.

Likewise, we acknowledge the Bindal people, traditional custodians of the western banks of Ross River, which form our Port limits, and the Nywaigi people, traditional custodians of the area where the Port of Lucinda is located.

Finally, we acknowledge the Traditional Owners of the lands from which products come to our Ports and the waterways that connect us. Our natural resources are drawn from lands and waterways long cared for by First Nations people and we thank them for their contribution to our nation.

We pay our respects to Elders past, present and emerging and to all First Nations people across our hinterland areas.

# CONTENTS

|           |                                                             |           |
|-----------|-------------------------------------------------------------|-----------|
| <b>1</b>  | <b>MODERN SLAVERY STATEMENT 2024-2025</b> .....             | <b>4</b>  |
|           | CHAIR & CEO'S MESSAGE .....                                 | 4         |
| <b>2</b>  | <b>ABOUT US</b> .....                                       | <b>5</b>  |
|           | PORT OF TOWNSVILLE .....                                    | 5         |
|           | PORT OF LUCINDA.....                                        | 5         |
| <b>3</b>  | <b>INTRODUCTION</b> .....                                   | <b>6</b>  |
| <b>4</b>  | <b>REPORTING ENTITY</b> .....                               | <b>6</b>  |
| <b>5</b>  | <b>STRUCTURE, OPERATIONS AND SUPPLY CHAINS</b> .....        | <b>6</b>  |
|           | 5.1 GOVERNANCE STRUCTURE .....                              | 6         |
|           | 5.2 OPERATIONS .....                                        | 7         |
|           | 5.3 MODERN SLAVERY RISKS IN OUR OPERATIONS .....            | 7         |
|           | 5.4 MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS .....         | 8         |
| <b>6</b>  | <b>RISKS OF MODERN SLAVERY PRACTICES</b> .....              | <b>8</b>  |
|           | 6.1 RISK ENVIRONMENT .....                                  | 8         |
|           | 6.2 IDENTIFY RISK .....                                     | 9         |
|           | 6.3 RISK MITIGATION .....                                   | 9         |
|           | 6.4 CONTINUOUS IMPROVEMENT .....                            | 9         |
| <b>7</b>  | <b>ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS</b> .....      | <b>10</b> |
| <b>8</b>  | <b>HOW EFFECTIVENESS IS ASSESSED</b> .....                  | <b>10</b> |
| <b>9</b>  | <b>CONSULTATION WITH OWNED OR CONTROLLED ENTITIES</b> ..... | <b>11</b> |
| <b>10</b> | <b>APPROVAL DETAILS</b> .....                               | <b>11</b> |

# 1 MODERN SLAVERY STATEMENT 2024-2025

## CHAIR & CEO'S MESSAGE

The Port of Townsville, established in 1864, has long served as a vital gateway for Northern Queensland, connecting regional industries to global markets and supporting economic growth. As one of Australia's key strategic ports, we recognise our role in facilitating trade and commerce and in contributing to the communities in which we operate. While our core focus remains on safe and efficient port operations, we are committed to taking considered steps toward sustainability and ethical business practices. Our approach is grounded in transparency, accountability, and continuous improvement, ensuring that the actions we take are practical, measurable, and aligned with our capabilities.

We are working to develop and implement a robust framework for identifying and addressing modern slavery risks within our operations and supply chains. This reflects our responsibility as a critical gateway for trade and our determination to uphold ethical standards.

We are pleased to present the Port of Townsville's inaugural Modern Slavery Statement, prepared in compliance with the *Modern Slavery Act 2018* (Cth). This statement outlines the initial steps we have taken during 2025 to understand and manage modern slavery risks, and it sets out the actions we plan to progress in 2026 and beyond. We acknowledge that this is the beginning of a long-term journey, and our focus will remain on strengthening governance and risk management practices over time.

This first statement represents an important foundation. By approaching this work thoughtfully and transparently, we aim to make meaningful progress and ensure our operations reflect responsible and ethical practices.

## 2 ABOUT US

### PORT OF TOWNSVILLE

The Port of Townsville, established in 1864, handles more than 30 different commodities and is Australia’s leading exporter of copper, zinc, lead, sugar, fertiliser, and molasses. It is Northern Australia’s largest container and automotive port and a critical gateway for trade in Queensland. Strategically located in Northern Australia, the port supports regional industries and plays a vital role in defence and cruise shipping. The Port manages around 350 hectares of land and eight operating berths, facilitating over 7 million tonnes of cargo valued at more than \$12 billion annually. The port is well connected by road and rail to mining and agricultural regions, and it offers modern facilities for container handling, bulk minerals and liquids, automotive, breakbulk and project cargo.



### PORT OF LUCINDA

Located about 100 kilometres north of Townsville near Hinchinbrook Island, the Port of Lucinda is a specialised bulk sugar export terminal. It is renowned for its impressive 5.6-kilometre jetty - the longest of its kind in the southern hemisphere - which extends into the Coral Sea to accommodate large vessels. The port primarily handles raw sugar from the Herbert River region, with an annual throughput around half a million tonnes.

#### OUR VISION

Australia’s Port for the Future

#### OUR MISSION

Creating prosperity for our communities and value for our customers and shareholders through world-leading sustainable operations

#### OUR VALUES



##### PARTNERSHIPS

We build meaningful and lasting relationships



##### OPPORTUNITIES

We continuously innovate



##### RESPECT

We respect each other



##### TRUST

We do the right thing

#### OUR CONTRIBUTIONS

**\$12 billion**

value of trade

**8,000**

jobs in the region supported by port activities

**130+**

port connections to 44 countries

**80%**

of Northern Australia’s population serviced

**Strategic**

Defence port for Australian and allied navies

**30,000+**

cruise visitors between 2024-25 (passengers and crew)

**\$50,000+**

community support over the last year

**7 million**

tonnes of trade and > 30 commodities

### 3 INTRODUCTION

This is the Ports of Townsville’s first Modern Slavery Statement prepared in compliance with the *Modern Slavery Act 2018* (Cth).

As we begin our formal modern slavery journey, this statement reflects our commitment to help contribute towards the elimination of modern slavery, it details the actions we have taken during the reporting period to identify and address modern slavery risks across our operations and supply chain, and the steps we will take to strengthen our approach in the years ahead.

### 4 REPORTING ENTITY

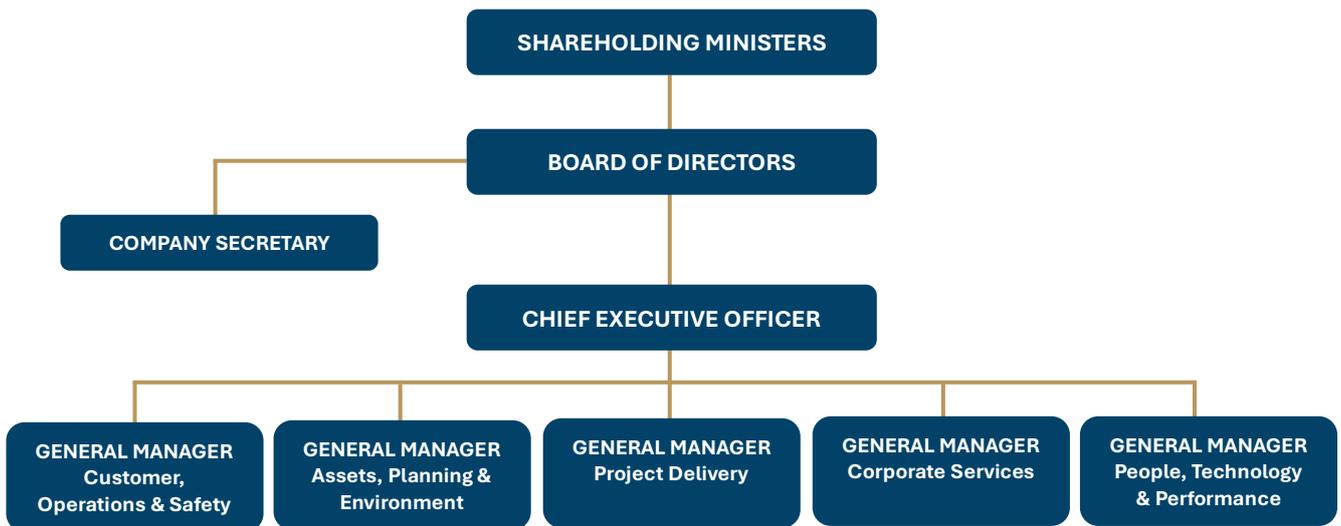
This Modern Slavery Statement is submitted by Port of Townsville Limited (ABN: 44 411 774 236) (Port of Townsville) for the financial year ending 30 June 2025, in accordance with the *Modern Slavery Act 2018* (Cth).

### 5 STRUCTURE, OPERATIONS AND SUPPLY CHAINS

#### 5.1 GOVERNANCE STRUCTURE

The Port of Townsville is a Government-Owned Corporation governed by the *Government Owned Corporations Act 1993* (Qld).

The company is wholly owned by the Queensland Government through two shareholding Ministers - the Minister for Transport and Main Roads, and the Minister for Finance, Trade, Employment and Training. The Port of Townsville is overseen by an independent Board of Directors.



The Port of Townsville undertakes its responsibilities with diligence, ensuring port operations are managed efficiently and in accordance with recognised governance frameworks. Compliance with applicable legislation remains a core obligation in all aspects of our activities.

Oversight of modern slavery risk is provided by the Audit and Risk Committee which is responsible for monitoring the effectiveness of the Port's governance, risk management, and compliance frameworks. Its role includes reviewing key risks, ensuring appropriate internal controls are in place, and overseeing statutory and regulatory obligations.

The Port of Townsville employs 187 people (at 30 June 2025) across two locations:

- Corporate Office: 1 Benwell Road, Townsville, QLD 4810
- Lucinda Office: Wharf Road, Lucinda, QLD 4850

## 5.2 OPERATIONS

Port of Townsville is declared as a port authority under the *Transport Infrastructure Act 1994 (Qld)* responsible for the ports of Townsville and Lucinda. Key functions under this Act include to:

- Establish, manage, and operate effective and efficient port facilities and services within its ports.
- Make land available for the establishment, management, and operation of port facilities and services by other persons, or other purposes consistent with the operation of its ports.
- Provide or arrange for ancillary services or works necessary or convenient for the effective and efficient operation of the ports.
- Maintain appropriate levels of safety and security in the provision and operation of facilities and services.
- Provide other incidental services that support its functions or enhance port usage.

Port of Townsville is also designated as the pilotage authority for the ports of Townsville and Lucinda under the *Transport Operations (Marine Safety) Act 1994 (Qld)*. In this role, the Port provides pilotage services in compulsory pilotage areas to ensure safe vessel navigation. Port of Townsville also delivers contracted pilotage services at Abbot Point on behalf of the Queensland Department of Transport and Main Roads.

In addition, the *Sustainable Ports Development Act 2015 (Qld)* establishes requirements for priority ports, including Townsville, to ensure development occurs in a way that protects the Great Barrier Reef and supports long-term sustainability.

## 5.3 MODERN SLAVERY RISKS IN OUR OPERATIONS

Port of Townsville operates primarily within Queensland, and our direct workforce is employed in accordance with Australian labour laws, which provide strong protections against modern slavery. All employment arrangements comply with applicable legislation and industrial awards, including the *Fair Work Act 2019 (Cth)* and associated regulations.

The purpose of this statement is to report on modern slavery risks in Port of Townsville's activities including the procurement of products and services required for our own services and operations. These products and services can be broadly categorised as:

- **Operational Services** – including marine pilotage, towage, maintenance, security, and environmental services, which are largely sourced from local providers.
- **Infrastructure and Capital Works** – involving contractors and subcontractors for dredging, construction and engineering projects. These activities may include procurement of materials such as steel, concrete, and aggregates, some of which originate from overseas markets.

- **Equipment and Technology** – covering port machinery, vehicles, digital, communications, IT hardware, and software systems. These products often involve global manufacturing and distribution networks, which can present higher modern slavery risks due to complex tiers and offshore production.
- **General Goods and Services** – such as office supplies, catering services, uniforms, professional consultancy and cleaning services, which typically involve domestic suppliers but may include imported components.

While most of our direct suppliers operate within Australia, we acknowledge that many of the goods and materials used across our operations likely originate from international supply chains that may present heightened risk of labour exploitation.

As a Queensland Government Owned Corporation, we are required to adhere to the Queensland Procurement Policy, which embeds sustainability, ethical sourcing and social responsibility into procurement decisions. This statement reinforces our commitment to responsible stewardship and provides a basis for our efforts to identify, assess and mitigate modern slavery risks within our supply chain.

Seafarer welfare is an area of recognised risk within global maritime supply chains, particularly where crews may face challenging conditions or limited access to support services. While Port of Townsville does not directly employ seafarers, we acknowledge the importance of safeguarding their wellbeing. We maintain strong relationships with the Mission to Seafarers, including provision of services and support, and work collaboratively with regulatory agencies to facilitate access to welfare services and ensure compliance with international standards. Through these partnerships, we aim to support seafarers visiting our ports and contribute to broader efforts to uphold human rights in maritime operations.

## 5.4 MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

Port of Townsville operates within a complex port environment that includes a diverse network of customers, tenants, and service providers such as logistics companies, stevedores, transport operators, and marine service providers. While these entities manage their own operations and workforce, their activities are closely connected to the functioning of our ports.

Beyond our immediate operations, our supply chains intersect with the global movement of imported and exported goods. While these goods are not owned by the Port, and while we do not control their upstream supply chains, we acknowledge that international trade networks can involve multiple tiers and varying levels of modern slavery risk. We recognise these challenges and will collaborate with stakeholders to support ethical standards across the broader supply chain.

# 6 RISKS OF MODERN SLAVERY PRACTICES

## 6.1 RISK ENVIRONMENT

According to the Walk Free Global Slavery Index 2024, Australia ranks among the countries with the lowest prevalence of modern slavery globally, at 149 out of 160 countries. The estimated prevalence is 1.6 per 1,000 people, and Australia has a very low Vulnerability Score of 7/100, reflecting strong governance, legal protections, and social systems. While risk within Australia is low, vigilance remains essential in relation to global supply chains and imported goods.

## 6.2 IDENTIFY RISK

Port of Townsville acknowledges that it is early in its program to identify and investigate modern slavery risks in operations and supply chain. As such, for the reporting period the focus is on the measures taken with respect to tier one suppliers.

Port of Townsville considers the risk of modern slavery within its business operations and recognises that through its supply chain and other third-party relationships and operating activities (via customers and suppliers), that it may have exposure indirectly to the risk of modern slavery.

Port of Townsville assessed its direct workforce risk as low in relation to modern slavery. The people and culture policies and practices further mitigate this risk. On that basis the greatest risk of involvement in modern slavery is through third party relationships. Therefore, initial processes relating to the risks of modern slavery have primarily focussed on the tier one supply chain.

## 6.3 RISK MITIGATION

The Port of Townsville operates under an Integrated Management System certified to international standards for Quality (ISO 9001), Environment (ISO 14001), Safety (ISO 45001), and Information Security (ISO 27001). These certifications reflect our commitment to robust governance and continuous improvement across all aspects of our operations.

In alignment with the Queensland Procurement Policy's Ethical Mandate, the Port conducts compliance checks for new suppliers through the State Government Compliance Portal. This process helps minimise the risk of engaging with parties that do not meet ethical standards.

Additionally, all tenders and requests for quotation require suppliers to agree to comply with the Queensland Government's Ethical Mandate and Modern Slavery provisions before any contract is awarded. In 2024, the Port commenced a review of its contract templates, resulting in the inclusion of modern slavery clauses in all significant template contracts.

During 2025 the Port of Townsville commenced implementation of an independent, externally managed Speak Up hotline for employees and third parties. This service provides a secure and confidential channel to report actual or suspected issues, wrongdoing, or illegal activity, including matters related to modern slavery.

## 6.4 CONTINUOUS IMPROVEMENT

The Port of Townsville has established a multi-disciplinary team with representation from legal, procurement, port operations, and finance. This team is responsible for enhancing policies, procedures, and processes to improve risk mitigation and build greater awareness of modern slavery across the organisation.

The Speak Up program to be implemented in the next reporting period will complement existing internal reporting mechanisms and offer multiple reporting options, including a secure online form accessible via QR code and web link, as well as phone, email, and traditional mail.

## 7 ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Port of Townsville has in place a range of established governance, procurement, contractual and operational policies, procedures and controls. Our actions are underpinned by corporate policies and procedures that promote ethical conduct, compliance, and accountability. Together, these frameworks guide how we engage suppliers, manage contracts, and monitor performance. Key controls include requiring suppliers to comply with relevant legislation, incorporating modern slavery clauses in significant contract templates, conducting due diligence during procurement, and maintaining escalation pathways for concerns.

During this reporting period, Port of Townsville focused on establishing the foundations for modern slavery risk management. Key actions included:

- **Threshold Assessment** – Confirmed that the Port will exceed the reporting threshold under the *Modern Slavery Act 2018 (Cth)* for the first time.
- **Capability Building** – Identified the need to develop organisational knowledge and understanding of modern slavery risks and compliance requirements.
- **Governance Structure** – Established a multi-disciplinary working group to lead the development of policy, procedures, and processes in this area.
- **Speak Up Mechanism** – Commenced implementation of an internal and external Speak Up hotline to enable confidential whistleblower and other reporting.
- **Document Review** – Commenced an initial review of existing documentation to identify current coverage of modern slavery in contracts and procurement processes.
- **Board Engagement** – Initiated work to update the Audit and Risk Committee of the Board on the Port's reporting obligations and progress.

## 8 HOW EFFECTIVENESS IS ASSESSED

We recognise that assessing the effectiveness of our actions is critical to continuous improvement. At this stage, our focus has been on identifying foundation actions. Effectiveness is currently measured through integration of modern slavery clauses into contracts, outcomes of supplier compliance checks, reporting to relevant government agencies as required and reporting to the Audit and Risk committee. These measures will help us evaluate and strengthen our approach year on year.

The Port of Townsville assesses the effectiveness of actions through:

- Continuous improvement.
- Tracking progress through its Board Audit and Risk Committee.
- Monitoring grievance mechanisms and whistleblower reports.

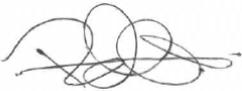
## 9 CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

The Port consulted internally as it has no subsidiaries. All appropriate teams contributed to the preparation of this statement.

## 10 APPROVAL DETAILS

This statement was approved by the principal governing body of Port of Townsville Limited, as defined by the *Modern Slavery Act 2018* (Cth) (the Act), on 8 December 2025.

This Modern Slavery Statement is signed by a responsible member of the Port of Townsville, as defined by the Act.



**Peter Court**  
**Board Chairperson**



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