Modern Slavery Prevention Policy

POT-2795
REVISION: 1

1. POLICY STATEMENT

Port of Townsville Limited (the Port) is committed to upholding human rights and preventing modern slavery from its operations and supply chains. Recognising the nature of port operations and global trade interfaces, the Port acknowledges that exposure to modern slavery risks may arise through procurement of goods and services and indirectly through third-party arrangements. The Port adopts a zero-tolerance approach to modern slavery and will proactively identify and manage modern slavery through a risk-based approach, integrated into procurement and contract management processes. This includes alignment with the *Modern Slavery Act 2018* (Cth) (the Act), Queensland Procurement Policy (QPP) and the Queensland Procurement Assurance Model (PAM) Framework, ensuring appropriate governance, assurance and continuous improvement mechanisms are in place.

2. PURPOSE

The purpose of this policy is to:

- set out the Port's commitment to identifying, preventing and addressing modern slavery risks in its operations and supply chains;
- establish a governance framework for managing modern slavery risk consistent with the Port's *Risk and Resilience Policy* and *Enterprise Risk Management Framework*;
- ensure compliance with the *Modern Slavery Act 2018* (Cth) and reporting obligations; and
- align procurement practices with the Queensland Procurement Policy, including ethical sourcing requirements outlined in the Procurement Assurance Model Framework.

3. SCOPE

This Policy applies to:

- All Directors, Officers, employees and Contractors; and
- The Port's business activities, procurement activities, operations and supply chains.

4. PRINCIPLES

4.1 RISK-BASED APPROACH

The Port will identify and manage modern slavery risks using a risk-based approach consistent with:

- The Port's Enterprise Risk Management Framework; and
- The PAM Framework requirements for risk assessment, complexity, and procurement categorisation.

This includes consideration of procurement value, risk and complexity; supplier and geographic risk factors; and industry-specific modern slavery risk exposure.

4.2 INTEGRATION WITH PROCUREMENT LIFECYCLE

Modern slavery risk management will be embedded across the procurement lifecycle, including:

- **Planning Phase** (PAM Stage 1-2)
  - Identification of modern slavery risks in procurement planning and business case development;
  - Consideration of ethical supply chain requirements in sourcing strategies.

- **Sourcing Phase** (PAM Stage 3)
  - Inclusion of modern slavery due diligence, evaluation criteria and supplier disclosures;
  - Application of appropriate weighting of non-price criteria where relevant.

- **Contract Management** (PAM Stage 4)
  - Ongoing monitoring of supplier performance and modern slavery obligations;
  - Escalation and management of identified risks or incidents.

5. REPORTING CONCERNS OF MODERN SLAVERY

The Port supports and encourages the reporting of concerns or grievances about modern slavery matters, whether identified by, or affecting them, in the workplace. Port employees, contractors, suppliers and other third party representatives are encouraged to report any instances that suggest:

- That there is a risk, both potential and actual, of modern slavery occurring in the supply chain, activities or recruitment function at the Port or its suppliers; and
- That suppliers or third party contractors engaged by the Port are engaging in, potential or actual modern slavery.

Employees may report via their usual chain of authority or otherwise as set out in this document.

If someone is at risk of immediate harm, call Triple Zero (000).

Concerns relating to modern slavery can be reporting via the following pathways:

5.1 INTERNAL AUTHORITIES

Internal Authority:	Contact Details:
Port of Townsville	Where the concern relates to the Ports operations and supply chain: • Phone: 07 4781 1500 (Office Hours) • Phone 07 4781 1683 (Duty Officer) • Email: community@townsvilleport.com.au
Manager Procurement & Contracts	Where the concern relates to a supplier or the procurement of goods and services: • Phone: 07 4781 1500 • Email: procurement@townsville-port.com.au
Company Secretary:	• Phone: 07 4781 1500 • Email: companysecretary@townsville-port.com.au • Post, addressed to: Company Secretary, Port of Townsville Limited PO Box 1031, Townsville QLD 4810
SpeakUp Hotline facilitated by CoreIntegrity (independent of the Port):	• Call: 1800 360 084 and speak with a representative from CoreIntegrity. • Online via the CoreIntegrity online reporting form: Link here • Email: speakup@coreintegrity.com.au • Post, addressed to: PO Box 730, Milsons Point NSW 1656 (re: Port of Townsville)

Where a report concerning modern slavery is received by an Internal Authority of the Port, the matter will be referred to the Company Secretary for further reporting and investigation. The Company Secretary will record the allegation and refer the matter as appropriate to the Australian Maritime Safety Authority, Australian Federal Police, or relevant external authority, for further investigation. The Company Secretary will maintain privacy and confidentiality of complainants in accordance with applicable privacy requirements.

5.2 EXTERNAL AUTHORITIES

Concerns relating to modern slavery can also be reported to external agencies that have responsibility for investigating the modern slavery information being disclosed:

External Agency:	Reporting Details:
Australian Federal Police (AFP)	As the lead agency for investigating human trafficking and modern slavery crimes, reports can be made directly to the AFP. Call 131 237 (131 AFP) or refer AFP website - Human trafficking and slavery

6. REVIEW & MONITORING

The Port will publish a Board-approved annual Modern Slavery Statement, in accordance with the Modern Slavery Act.

A Modern Slavery Implementation Plan will ensure oversight by the Board and Audit and Risk Committee.

7. COMPLIANCE AND RELATED LEGISLATION

LEGISLATION
Modern Slavery Act 2018 (Cth) *Criminal Code Act 1995 (Cth)* *Navigation Act 2012 (Cth)* *Marine Order 11 (Living and Working Conditions on Vessels) 2024*
STANDARDS
Queensland Government Procurement Policy (QPP) 2026 Queensland Government Procurement Assurance Model Framework (PAM) Maritime Labour Convention 2006

8. DEFINITIONS AND ACRONYMS

QPP	Queensland Government Procurement Policy
PAM	Queensland Government Procurement Assurance Model Framework

9. RELATED DOCUMENTS

DOCUMENT NUMBER	DOCUMENT TITLE
tba	Modern Slavery Implementation Plan
POT-1954	Procurement Policy (and associated procedure/s)
POT-1100	Risk and Resilience Policy
POT-2354	Enterprise Risk Management Framework
POT-2652	Whistleblower Policy

10. DOCUMENT INFORMATION

DOCUMENT OWNER	General Manager Corporate Services
APPROVAL AUTHORITY	Board
APPROVAL DATE	24/08/2026
APPROVAL RESOLUTION NO.	24082026 8.6
REVIEW SCHEDULE	36 months
NEXT REVIEW DATE	24/08/2029