

1 INTRODUCTION

GeelongPort Pty Limited and Ports Pty Limited (GeelongPort) values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

GeelongPort defines 'Modern Slavery' in accordance with the definitions provided in *Modern Slavery Act 2018 (Cth) (MSA)*, that is including:

- (a) Human trafficking;
- (b) slavery;
- (c) servitude;
- (d) forced labour;
- (e) debt bondage;
- (f) forced marriage; and
- (g) the worst forms of child labour,

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2 APPLICATION

This Modern Slavery Policy (**Policy**) applies to all directors, officers and employees collectively "you" of GeelongPort.

3 ZERO TOLERANCE APPROACH TO MODERN SLAVERY

GeelongPort has a zero-tolerance 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.

GeelongPort endeavours to ensure that it, and its employees and contractors, comply with all applicable laws such that it:

- (a) does not use any form of forced, compulsory bonded or involuntary labour;
- (b) provides that all work is freely chosen and safe and fair working conditions for all its employees;
- (c) ensures that no worker is required to provide money as a condition of their employment and workers are allowed to maintain control of their identification documents; and
- (d) ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates.

GeelongPort expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, including specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children.

4 ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY

GeelongPort is committed to the Policy and has put measures in place that are designed to prevent and detect modern slavery within its business and supply chain, including:

- (a) a policy which articulates GeelongPort's commitment to prevent acts of modern slavery and reduce risks of acts of modern slavery within its operations and supply chain, being this Policy;
- (b) communication of this Policy and all relevant elements of the programme to all employees throughout GeelongPort and to our business partners and supply chain;
- (c) the assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- (d) the adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the MSA; and
- (e) training of all relevant individuals throughout GeelongPort so that individuals can recognise modern slavery practices and take steps to address.

GeelongPort is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains.

5 COMPLIANCE WITH THIS POLICY

Anyone working on GeelongPort's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and suppliers must read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of GeelongPort's businesses and supply chains is the responsibility of all those working for it or under its control. Those working on GeelongPort's behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

6 REPORTING

Internal reporting is critical to GeelongPort's success and it is both expected and valued.

You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in “good faith”.

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must report the matter to their manager and the legal department as soon as possible.

If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of GeelongPort’s supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager and GeelongPort’s Legal Department.

GeelongPort aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. GeelongPort is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform GeelongPort’s Legal Department immediately.

7 COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

GeelongPort’s zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8 BREACHES OF THIS POLICY

Any employee who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct may face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you.

GeelongPort may terminate its relationship with other individuals and organisations working on its behalf engaged by it if they breach this Policy.

9 KEY CONTACTS

If you have any questions about this Policy, please contact the GeelongPort Legal Department.