NSWPorts

Joint Modern Slavery Statement

FOR THE FINANCIAL YEAR ENDING 30 JUNE 2026



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as trustee for NSW Ports Property Hold Trust
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NSW Ports Operations Hold Co Pty Ltd
as trustee for NSW Ports Operations Hold Trust
ABN 28 792 171 144

Port Botany Operations Pty Ltd
as trustee for Port Botany Unit Trust
ABN 25 855 834 182

NSW Ports Botany Property Co Pty Ltd
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Introduction

This is the NSW Ports group of companies (**NSW Ports**) statement on modern slavery for the financial year ending on 30 June 2026 ('**FY26**'), made and published in accordance with our obligations under the *Modern Slavery Act 2018* (Cth) (the **Act**). NSW Ports fully supports the aims of the Act and we hereby reiterate our commitment to tackling the risks of modern slavery in our business and procurement supply chains and to implementing actions to address any such risks, wherever possible.



Our Structure and Operations

This statement is made pursuant to section 14 of the Act and constitutes NSW Ports' joint statement on modern slavery for the following reporting entities for FY26:

- NSW Ports Operations Hold Co Pty Limited as trustee for NSW Ports Operations Hold Trust and its subsidiaries:
  - Port Botany Operations Pty Limited as trustee for Port Botany Unit Trust;
  - Port Kembla Operations Pty Limited as trustee for Port Kembla Unit Trust;
- NSW Ports Pty Limited as trustee for NSW Ports Property Hold Trust and its subsidiaries:
  - NSW Ports Botany Property Co Pty Limited as trustee for NSW Ports Botany Property Trust; and
  - NSW Ports Finance Co Pty Limited.

NSW Ports consists of the above reporting entities and one other entity that is owned and controlled by NSW Ports Pty Ltd: NSW Ports Kembla Property Co Pty Limited as trustee for NSW Ports Kembla Property Trust (**PKPT**).

The boards of all NSW Ports entities have the same Directors and are hereafter referred to as the 'Board'. This statement covers all NSW Ports' entities, was approved by the Board on behalf of each of the reporting entities comprising NSW Ports on 22 October 2026 and is correct as at that date.

NSW Ports manages Port Botany, Port Kembla, Cooks River Intermodal Terminal and Enfield Intermodal Logistics Centre. Port Botany and Port Kembla are key trade gateways and essential infrastructure assets to the state of New South Wales (**NSW**), the largest economy in Australia. Port Botany is the primary container port serving Australia's largest state economy, NSW, and Sydney. Port Botany also has the largest common user bulk liquids facility in Australia. Port Kembla, located 90 kilometres south of Sydney, is the only significant bulk port in southern NSW and is NSW's motor vehicle import port.

NSW Ports operates its business as a landlord infrastructure asset. NSW Ports leases and manages an extensive portfolio of land which comprises leases of land to stevedores and other port-related operators. As custodians of these assets, NSW Ports is committed to taking a long term and sustainable approach to the way we operate, the actions that we need to take or encourage from others, and the way that we work with our tenants and suppliers.

NSW Port's vision is to sustainably manage and deliver essential trade infrastructure for the economy and community, while our purpose is to support Australia's maritime trade needs, at all times living our values: Care, Collaboration, Passion, Integrity and Accountability.

NSW Ports 2063: Our 40-Year Master Plan for Sustainable Growth (our '**Master Plan**') and our *2025 Sustainability Strategy* (our '**Sustainability Strategy**') articulate the direction for our operations and assets into the future. Our Master Plan outlines priorities and actions required to cater for trade growth and diversification needs of the people and businesses of NSW. Achieving our Master Plan objectives will contribute to sustainable ports and supply chains – reducing emissions, minimising community impacts, supporting the competitiveness of exports and supporting cost-effective goods for consumers and businesses. Our Sustainability Strategy will also support NSW Ports to drive long-term value creation, effectively manage risks, enhance resilience and promote responsible growth.

Further details on our Master Plan and Sustainability Strategy can be found on our website: **www.nswports.com.au**.




OUR CORPORATE STRATEGY
OUR PURPOSE
To support Australia's maritime trade needs
OUR VISION
To sustainably manage and deliver essential trade infrastructure for the economy and community
HOW WE'LL GET THERE
OBJECTIVES
GROWTH
Build value through growth and innovation
STAKEHOLDERS
Support strong stakeholder relationships
PEOPLE
Promote a highly engaged and effective workforce
OPERATIONS
Champion safe, resilient and efficient operations

Our Supply Chains

While NSW Ports is a key participant in the wider NSW supply chain, the purpose of this statement is to report on modern slavery risks in NSW Ports' procurement supply chains, being the products and services (including labour) that contribute to NSW Ports' own services. These products and services include: construction, design and engineering services; consultancy and advisory services; digital managed services and information technology; facilities management services; financial services; fleet management; office supplies; rail management services; security services; training services; travel and utilities.

Policy Framework

At NSW Ports, we recognise the importance of respecting human rights and we are committed to protecting the fundamental rights of all people including our employees, our customers, the communities in which we operate, those who may be impacted by our operations and those within our procurement supply chains. NSW Ports' management of modern slavery risks falls within our overall approach to protecting and upholding human rights and preserving the freedom, dignity and equality of all human beings. The foundational documents for human rights protection are NSW Ports' Modern Slavery Policy (incorporated in this Statement), Code of Conduct, Grievance Policy, Health, Safety and Environment Policy, Procurement Policy, Whistleblower Protection Policy and our 2025 Sustainability Strategy.

These documents outline NSW Ports' approach to establishing the essential standards of corporate and personal conduct and the behaviour expected of everyone who works for or with NSW Ports. These documents outline clear requirements and expectations on the identification and management of issues associated with modern slavery within NSW Ports' operations and our supply chains.

Further, these documents provide specific guidance to our personnel on standards to be achieved across the business and make provision for sourcing suppliers on a risk-assessed basis. In FY26 we implemented a new Supplier Code of Conduct, outlining the minimum standards and behaviours that NSW Ports expects from its suppliers in ensuring business is conducted responsibly and sustainably. This includes our expectations regarding labour and human rights and encourages suppliers to raise any concerns regarding modern slavery with their contact at NSW Ports. The Supplier Code of Conduct was shared with existing suppliers at implementation and employees are required to share it with new suppliers before they are onboarded.

NSW Ports has appointed an independent external provider to receive whistleblower reports, which facilitates anonymous reporting.



Governance

Good corporate governance is critical to the long term, sustainable and ethical success of NSW Ports. Consistent with NSW Ports' risk management approach to potential modern slavery risks in its business and supply chain, the Board is responsible for providing oversight of this issue. Given the nature of this risk, the key focus of senior management is on working collaboratively with NSW Ports' suppliers to ensure that expectations and standards are understood and that potential exposures to modern slavery risks are either eliminated or minimised so far as is reasonably practicable.

Risk Environment

The Global Slavery Index (published in 2023) ranked the prevalence of and vulnerability to modern slavery in Australia as very low, with a Prevalence Index Rank of 149/160[1] and a Vulnerability to modern slavery score of 7%[2].

Our Modern Slavery Policy

Respect for human rights is fundamental to NSW Ports' values, long-term sustainability, the growth of our business and to the wellbeing of the communities in which we operate. Modern Slavery represents a grave human rights abuse.

NSW Ports does not permit any forms of modern slavery in its operations and supply chains. Workers must be free to terminate their employment at any time after giving reasonable notice. Suppliers are encouraged to raise any concerns regarding modern slavery with NSW Ports. NSW Ports takes a zero-tolerance approach to modern slavery in its own operations and where a supplier fails to take action to address an identified case. This approach reflects a commitment to act ethically and responsibly in all business relationships. NSW Ports has continued to work with our employees, customers and suppliers to develop a deeper understanding of the risks of modern slavery in our operations and supply chains.

Employees are asked to promptly report any modern slavery concerns to the General Counsel.

1 Australia ranked 149 out of 160 countries assessed against the Global Estimates of Modern Slavery criteria produced by the International Labour Organization, Walk Free Foundation and International Organization for Migration.

2 The Global Slavery Index Vulnerability Model is built on statistical testing and processes to identify the factors that explain or predict the prevalence of modern slavery. The 2023 Vulnerability Model provides a risk score for 160 countries based on an analysis of data covering 23 risk variables across five major dimensions.





Modern Slavery Risks in our Operations

Dealing first with our operations, our workforce is predominantly made up of office-based employees employed on a full-time basis. Senior management maintains oversight of all employment contracting which is conducted in accordance with applicable laws and awards (including, without limitation, the *Fair Work Act 2009* (Cth) and the *Fair Work Regulations 2009* (Cth)). From time to time we also engage independent contractors to supply professional or consultancy services to NSW Ports, to supplement the employee workforce. During FY26, these engagements were also under the oversight of senior management and were documented in contracts requiring the supplier to comply with all applicable laws.

On this basis, NSW Ports assesses that the risk of modern slavery practices within our operations is low.

While not considered to be within the scope of NSW Ports' operations, NSW Ports acknowledges that there is a specific modern slavery risk in the maritime industry concerning international seafarers who are employed to work on vessels that berth at Port Botany and Port Kembla. NSW Ports has positive working arrangements with the Port Authority of New South Wales, Australian Maritime Safety Authority, Australian Border Force and other statutory authorities and industry stakeholders, including labour force welfare organisations, and is committed to assisting those parties to address modern slavery issues wherever possible.

Under our community investment program, NSW Ports has been an active partner of Mission to Seafarers, an organisation which takes care of visiting seafarers. In FY24, NSW Ports entered into a joint industry initiative with Port Authority of NSW and Port of Newcastle to launch a $2.5m Seafarer Welfare Fund. The five year program aims to support the provision of services, projects and programs for the seafarer workforce that call at ports throughout NSW. The seven 2026 recipients from the fund are Apostleship of the Sea Sydney/Stella Maris, Mission to Seafarers Eden, Mission to Seafarers Port Kembla, Mission to Seafarers Sydney, Mission to Seafarers Newcastle, Hunter Workers Rehabilitation and Counselling Service and Tas Bull Seafarers Foundation.



Modern Slavery Risks in our Supply Chains

NSW Ports is committed to working with our suppliers to assess and address the risks of modern slavery in our supply chains. As part of the risk assessment, we consider the nature of our relationship with suppliers, their industry sectors and geographic location(s), and the types of goods or services being provided.

The vast majority of NSW Ports' third-party procurement spend for goods and services is based within Australia. In FY26, NSW Ports also engaged suppliers based in France, Japan, Netherlands, New Zealand, UK and USA. Having assessed the risk environment in these jurisdictions based on the Global Slavery Index, these countries have a comparable prevalence of modern slavery to Australia. Based on geographic location of suppliers alone, NSW Ports considers that the risk of modern slavery in our direct procurement supply chain is low.

Having considered recent modern slavery research[3] and the types of goods and services procured by NSW Ports in FY26, security services, construction services, solar technology, information technology, catering and garments/textiles were identified as goods and services with a higher inherent risk of modern slavery. NSW Ports purchased an immaterial amount of food and garments/textiles in FY26, but made significant investments in security, construction and IT.

NSW Ports engages two labour hire companies to provide security services. Although labour hire can present an increased inherent risk of modern slavery due to lack of visibility of contracting arrangements, both of NSW Ports' contracted labour hire companies have given contractual commitments to comply with all applicable laws and to provide skilled and licensed security guards.

NSW Ports conducts an annual review and risk-assessment of our existing supplier base and issues 'Modern Slavery Questionnaires' (**Questionnaires**) to selected suppliers. Completing a Questionnaire requires the identified suppliers to self-assess their compliance with the Act and to verify the responses provided as true and correct. The Questionnaires also raise awareness about modern slavery risks generally. Our two labour hire security service providers and our largest suppliers (including ongoing construction and IT providers) were selected to complete Questionnaires for FY26.

By way of our Questionnaires, NSW Ports aims to foster pro-active engagement with our suppliers in sectors and industries deemed to have a higher risk of modern slavery in order to understand the policies and controls that they have implemented to manage modern slavery risks and, where deficiencies are identified, to work with them to address those issues. On the basis of our review for FY26, no instances of modern slavery in our direct procurement supply chain were detected, and NSW Ports considers that the risks of modern slavery practices in our direct procurement supply chains remains low.

NSW Ports notes that the solar industry is associated with risks of forced labour, particularly during the production of the raw material polysilicon. We periodically commission construction projects involving solar panel installations, but this did not take place during FY26. Our updated Procurement Policy provides that a modern slavery risk assessment is to be conducted prior to procurement of solar panels.

3 Based on the Global Slavery Index, the five products most at risk of being produced with modern slavery and imported into Australia are currently electronics, garments, textiles, fish and solar panels.

Addressing Modern Slavery Risks

In addition to the actions outlined in the above sections, NSW Ports has committed to ensuring that its employees understand and are compliant with our approach to preventing modern slavery in all of its forms.

During FY26, NSW Ports again undertook modern slavery compliance training for all new NSW Ports employees and implemented refresher training for existing employees. The purpose of the training was to provide employees with an understanding of what modern slavery is, factors that increase the risk of modern slavery, our responsibilities and what to do if they are informed of, or identify allegations of, modern slavery in our operations or procurement supply chains. 100% of new and existing employees completed the training. Going forward, NSW Ports will continue to require new employees to complete the full training course and will provide employees with periodic refresher training.

NSW Ports is committed to continually reviewing and enhancing our applicable policies and procedures to appropriately respond to modern slavery risks. To this end, NSW Ports will continue to:

- identify, monitor and assess categories of third-party procurement spend most 'at risk' to modern slavery;
- incorporate anti-modern slavery obligations into its processes where relevant, on a risk-assessed basis;
- include appropriate measures in its due diligence processes for sourcing suppliers and for verifying where those suppliers source their goods and services on a risk-assessed basis (including by way of the Questionnaire);
- provide guidance to relevant employees to ensure a high level of understanding of the risks of modern slavery;
- maintain its established whistleblowing procedure; and
- report its commitments, policy, performance and actions in tackling modern slavery to the Board and/or Audit and Risk Committee.

Assessing the Effectiveness of our Actions

NSW Ports will continue to monitor the effectiveness of the processes and procedures we have implemented to address the modern slavery risks that exist in our operations and supply chains. During FY26 we:

- provided face-to-face procurement compliance training to new employees with contract management responsibilities, with the aim of improving compliance with modern slavery due diligence; and
- reviewed and refined our annual Questionnaire to seek information from suppliers on their modern slavery risks.

We have been encouraged to see that supplier responses to the Questionnaire have matured over the past three years, including from suppliers that are not subject to the Act.

We will continue to conduct due diligence assessments and work with our suppliers to ensure that any modern slavery risks in our supply chains are appropriately managed. We will also continue to provide updates on modern slavery to the Board and/or the Audit and Risk Committee, as appropriate.

Consultation

As the Directors and senior management team of all reporting entities and PKPT are the same, consultation between entities in relation to the preparation of this statement (as is required under sections 14(c) and 16(f) of the Act) consisted of a joint review of the operations and supply chains of each entity, which was consolidated for the purposes of this joint statement on modern slavery and thereafter approved by the Board of Directors of each reporting entity on 22 October 2026.

Reporting

NSW Ports will continue to report on its approach to addressing modern slavery annually at the end of each financial year, in accordance with the requirements of the Act.

This statement was approved by the boards of each of the six reporting entities covered by this statement on 22 October 2026. This statement is signed by Christine Bartlett in her role as Chair and Director of the boards of the reporting entities.

Name: Christine Bartlett
Position: Chair and Director
Date: 28 October 2026



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