



# MODERN SLAVERY STATEMENT

Financial Year 2021-22

## OUR STRUCTURE

Tasmanian Ports Corporation Pty Ltd (ACN 114 161 938) (**TasPorts**) was established pursuant to the Tasmanian Ports Corporation Act 2005 and is wholly owned by the Tasmanian Government. TasPorts is a large proprietary company, responsible for eleven Tasmanian ports and the Devonport Airport. Over 99% of Tasmania's freight transits through these ports each year.

TasPorts' registered office is 90 Willis Street, Launceston in Tasmania 7250. TasPorts, Devonport Cradle Coast Airport and Capital Quarantine Services are business names registered to TasPorts.

TasPorts' wholly owned subsidiary company, Bass Island Line Pty Ltd (ACN 617 438 847) (**BIL**), operates the King Island shipping service. Bass Island Line is a registered business name of BIL.

King Island Ports Corporation Proprietary Limited (ACN 078 720 153) (**KIP**) is a wholly owned subsidiary of TasPorts. KIP's registered office is located at 285 Grassy Harbour Road, Grassy. KIP owns land and infrastructure assets at King Island but is otherwise a non-operating entity.

Flinders Island Ports Company Pty Ltd (ACN 079 544 399) (**FIP**) is a wholly owned subsidiary of TasPorts. FIP's registered office is located at 48 Formby Road, Devonport. FIP is a non-operating entity.

A single consolidated description of TasPorts', BIL's, KIP's and FIP's actions to address modern slavery risks has been prepared on the basis that:

- TasPorts' employees manage the operations of BIL, KIP and FIP;
- TasPorts' policies and procedures also apply to BIL, KIP and FIP;
- TasPorts' Board of directors is the same as BIL's Board;
- TasPorts' Chief Executive Officer and Chief Operating Officer are the directors of KIP and FIP, the TasPorts' General Counsel/Company Secretary is also KIP's and FIP's Company Secretary.

Accordingly, references in this Statement to TasPorts include a reference to all of TasPorts' subsidiaries.

Southern Export Terminals Pty Ltd (ACN 616 370 775) (**SET**) is a joint venture company with 50% of its shares held by TasPorts and 50% of its shares held by Qube Ports Pty Ltd (ACN 123 021 492) (**Qube Ports**). SET operates a log export terminal at the Port of Hobart. TasPorts does not control SET and SET does not need to prepare its own statement. However, TasPorts has reported on SET's operations and supply chains in this Statement.

Consistent with TasPorts values of Care, Together and Share, TasPorts has a strong commitment to social responsibility. In formulating and delivering our business strategy TasPorts takes into account our responsibility to the community, environment, our people, clients, suppliers and contractors.

This Statement describes the actions by TasPorts to address modern slavery risks in our operations and supply chains during the financial year ending 30 June 2022.



The background of the page is a photograph of a ship's hull, showing dark blue-grey metal plates with visible rivets. Two thick, light-colored ropes run diagonally from the top right towards the bottom right. On the left side, there is a large, rusted metal component, possibly a part of a crane or a ship's structure. The overall lighting is somewhat dim, with highlights on the ropes and the rusted metal.

# OUR OPERATIONS AND SUPPLY CHAINS



## OUR OPERATIONS

TasPorts is a vertically integrated organisation, providing a diverse range of operations and services around Tasmania. These include:

- provision and maintenance of essential port infrastructure, including berths, channels, wharves and landside assets;
- delivery of vital marine services around Tasmania, including pilotage, towage and vessel traffic services;
- supply of floating plant and equipment for marine engineering projects, construction and coastal haulage;
- provision of slipway and refuelling facilities;
- maintenance of community-use waterfront assets at Sullivans Cove, Stanley, Inspection Head and Strahan, and on King and Flinders islands;
- ownership and operation of Devonport Airport;
- ownership and operation of the Burnie Chip Export Terminal; and
- leasing its portfolio of land across the various ports and airport to a variety of tenants for various uses such as stevedoring, port related operations, community events, etc.

### BIL

Through BIL, TasPorts operates the King Island shipping service between Victoria, Grassy on King Island and mainland Tasmania using our vessel the *John Duigan* to transport cargo between King Island and Devonport and tranship cargo between Devonport and Victoria through our contracted shipping provider.

BIL started operating in April 2017 and caters for containerised, bulk and vehicular cargo and livestock.

### SET

Through a joint venture with Qube Ports, SET operates a log export business at the Port of Hobart. SET commenced operating in January 2017.

TasPorts' main contribution to the joint venture is the provision of land, administrative services and port infrastructure.

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Qube Ports is engaged as a subcontractor in relation to provision of services including:

- **Marshalling Services** such as truck receipt at the port, unloading of trucks at the port, log scaling and inventory management and load out of trucks to the vessel.
- **Stevedoring Services** including loading of logs from truck to on the vessel, operation of lifting equipment and equipment for stowing of logs on the vessel.

Some of this work may be considered base skilled labour and at times casuals are also utilised.

## OUR SUPPLY CHAINS

The main types of goods and services TasPorts procures fall within the following categories:

- **Infrastructure Projects** - design and engineering services, project management, construction.
- **Repair and Maintenance of Infrastructure and Assets** - vehicle maintenance, vessel repair and maintenance, wharf and infrastructure repair and maintenance, parts relating to maintaining, repairing and overhauling TasPorts' assets.
- **Utilities** - supply of electricity, gas, water, fuel and removal of waste.
- **Business Services** - business consultancy, IT equipment and software services, legal services, security services (berthing cruise ships, airport) and cleaning services.
- **Labour Hire** - for Burnie Chip Export Terminal and operations crew.
- **Port Equipment** - marine equipment and personal protective equipment (PPE).
- **Insurance.**

As at 30 June 2022, TasPorts had just under 300 employees, with 223 of these employees being full time.

### SET

SET has only a few suppliers as most supplies are incurred by the relevant joint venture parties to which the costs relate and as such most are captured either by TasPorts' or Qube Ports' supply chain analysis. Qube Ports report on its supply chain and operations through its holding company's Modern Slavery Statement.



## MODERN SLAVERY RISKS

### EMPLOYMENT

TasPorts' senior management oversees all employment contracting which is conducted in accordance with all laws and awards. All employees' terms and conditions of employment are governed either by a contract of employment or an industrial instrument and are all paid above minimum wage.

TasPorts has an employee Code of Conduct and a Workplace Behaviours Policy that provides a framework for making decisions and engaging in behaviours that are ethical and appropriate. TasPorts' Whistleblowing Policy and Public Interest Disclosure Policy and Procedures aim to encourage employees to report wrongdoings by TasPorts by protecting those who make a disclosure from detrimental action.

Through its initial due diligence process TasPorts identified that it did not have supervision of third-party workforce terms and conditions of employment and noted this issue for review and improvement in future reporting years. In the 2021-2022 financial year, TasPorts issued a supplier self-assessment survey to its largest:

- third-party workforce provider; and
- recruitment provider.

to enable TasPorts to conduct a more thorough analysis of the modern slavery risk of these high-risk suppliers. TasPorts' recruitment provider did not provide TasPorts with labour in any of the four main high-risk categories. This provider was required to prepare its own modern slavery statement and as such it had its own modern slavery policies and codes of conduct in place and provided training to its employees.

TasPorts' largest third-party workforce provider advised that it did not have its own modern slavery policies in place but did agree to comply with TasPorts' Modern Slavery Policy. This supplier indicated that they do not use any migrant or seasonal workers and all employees are provided with written contracts in a language they understand. Further, the labour provided by this provider involves skilled labour.

Despite the labour hire risk, TasPorts considers its risk of modern slavery practices within its workforce as low, as most of TasPorts' labour hire involves Tasmanian based skilled labour which reduces the risk of modern slavery in this area.

## PROVISION AND DELIVERY OF SERVICES

TasPorts recognises that maritime ports are a potential entry point into Australia for trafficking of persons. However, TasPorts has comprehensive security control measures established to mitigate the risk of organised crime and criminal activities of such a nature in its ports and maintains strong working relationships with Border Protection Agencies.

TasPorts considers the occurrence of human trafficking occurring at its ports to be a low risk.

TasPorts also acknowledges that it is a known issue that crews on some vessels from other jurisdictions using a port may be forced to work in sub-standard conditions onboard vessels. TasPorts is aware of the Maritime Labour Conventions and encourages its employees to raise concerns in relation to the welfare of seafarers onboard the vessels, complaints made to them whilst onboard or whilst at the port and to report these incidents to the Australian Maritime Safety Authority (AMSA).

TasPorts runs a Port Welfare Committee which members include a number of port users and AMSA. The aim of the committee is to improve the welfare of seafarers at our ports.

## CHARITABLE/SPONSORSHIP ACTIVITIES

TasPorts directs its sponsorship to local organisations, community events and projects with a focus on improving marine safety, preserving and promoting the maritime history of Tasmania, contributing to the preservation of Tasmania's unique marine environments, and enabling Tasmania's ongoing social and economic prosperity.

TasPorts provides support to an organisation which has a focus on the welfare of seafarers which operates from a number of our ports. This organisation provides another level of monitoring of the treatment of seafarers that visit these ports.



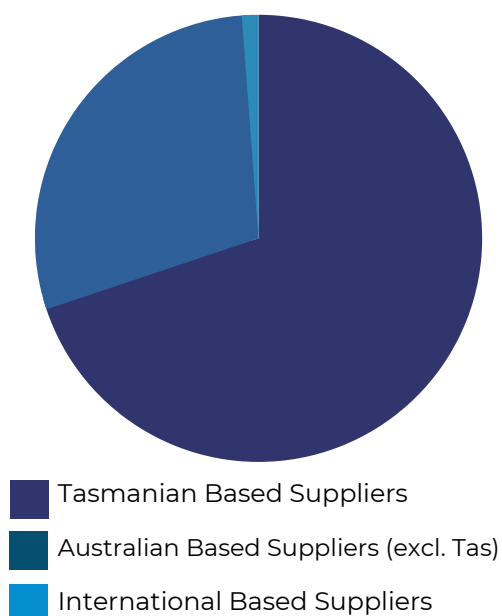
## SUPPLY CHAINS

The majority of TasPorts' suppliers are Tasmanian based and the remainder (excluding 12 suppliers) are Australian based suppliers (see chart below).

The 12 suppliers based outside Australia involved:

- 3 companies based in the United Kingdom;
- 4 companies based in the Netherlands;
- 1 company based in Singapore;
- 1 company based in New Zealand; and
- 3 companies based in Canada.

Of the suppliers identified as being based overseas, TasPorts has assessed them as low risk due to the locations and the political, socio-economic and legal factors which are present in these countries which reduce the prevalence of modern slavery. Further, the goods and services purchased from these suppliers are within industries that are also lower risk involving skilled labour.



As a result of the supply-based risk assessment that was undertaken for TasPorts of its 973 suppliers in the financial year ending 30 June 2020 and TasPorts' review of its additional 165 new suppliers for the financial year ending 30 June 2022, TasPorts was able to identify aspects of its supply chains and operations as posing the highest risks in relation to modern slavery.

The vast majority of agreements with our suppliers are project specific, short term arrangements. However, a large proportion of the agreements TasPorts enters into are with previously engaged suppliers.

TasPorts has identified the following areas of its supply chain as being at a higher risk to modern slavery practices:

- maintenance, security and cleaning service providers due to the nature of the industry and lack of oversight of the terms and conditions of employment;
- purchase of
  - PPE;
  - parts of infrastructure projects;
  - IT equipment,
 due to the likely location of the manufacturing of these products;
- purchasing of catering due to the nature of the sourcing of suppliers from the agriculture industry.

In the 2021-2022 financial year, TasPorts issued a supplier self-assessment survey to 15 of its suppliers across this selection of high-risk categories. As at the end of the reporting period only a small number of those surveys had been returned and as such the results of these surveys and whether any additional follow up is required will be reported in TasPorts' next Statement.

Despite these higher risk categories, TasPorts' suppliers were generally considered to be relatively low risk considering they are largely based within Australia. However, TasPorts acknowledges that some of its direct suppliers may have suppliers that source products from overseas which poses a risk of modern slavery practices which may be difficult to address.

TasPorts is committed to working with our direct suppliers to identify and address this risk. It is intended that the policies and procedures TasPorts have implemented to help combat modern slavery may assist us in influencing further down our supply chain. For instance, our Supplier Code of Conduct requires our direct suppliers to encourage their suppliers to adhere to our Code of Conduct.



**BIL's** supply chains were analysed as part of TasPorts' supply chain analysis. TasPorts considers the main risks of modern slavery in BIL's operations and supply chains to be in relation to:

- the purchase of parts for its vessel which although purchased from Australian suppliers may be sourced from overseas; and
- the operation of its vessel which is contracted to a third party via an agreement that predates the modern slavery legislation. However, TasPorts issued a supplier survey to the operator to assist in determining the risk of modern slavery occurring within that entity. The results of the survey were received after this reporting year ended but will be analysed and any concerns will be raised with that organisation and reported on in the next Statement. Further, prior to entering the agreement with the third party, TasPorts was advised that the third party's crew consisted of an all Australian crew and was provided with details of the relevant enterprise agreements covering their employees.





# ACTIONS TO CONTROL RISKS



## ACTIONS TO CONTROL/ASSESS/ ADDRESS THESE RISKS

### ASSESSMENT OF SUPPLIERS

TasPorts' assessment of its supply chain and identification of the higher risk industries will enable TasPorts to prioritise due diligence processes in future years. TasPorts issued surveys to 15 companies identified as being its highest risk suppliers in the financial year ending 2022.

The survey was designed to assess our suppliers' policies and practices on modern slavery to assist in the assessment of the likelihood of modern slavery practices occurring within particular suppliers.

Only a small number of the survey had been returned by the end of the reporting period, but of those returned:

- two-thirds of suppliers had their own modern slavery policies in place and had also provided relevant training to their employees;
- one-third of the suppliers did not have their own policies in place to safeguard against the risks of modern slavery, nor did they provide training to their employees. However, they did agree to comply with TasPorts' Modern Slavery Policy and there was no outsourcing of services and no migrant, seasonal or contract workers.
- only one-third of the suppliers provided details of their suppliers and the countries they operate in. This reduced TasPorts' ability to assess its second and third tier suppliers.

In future reporting years, TasPorts will follow up with those suppliers that returned surveys with unsatisfactory answers and continue to issue surveys to companies it identifies, as having a potential modern slavery risk within its operations or supply chain.

Depending on the results of the survey, or if repeated attempts to obtain answers to the survey go unanswered TasPorts will consider taking steps to terminate the relationship and if necessary, raise the issue with the appropriate authorities.

### UPDATED AGREEMENTS

TasPorts has updated its various supplier contracts to include a modern slavery clause requiring the supplier comply with our Supplier Code of Conduct, and notes that a material breach of the Supplier Code of Conduct will be considered a material breach of the relevant agreement.

Suppliers are also required to warrant that they have not been convicted of any offence involving modern slavery.

TasPorts has negotiated the inclusion of a modern slavery clause into its joint venture partner; Logistics Services Agreement between Qube Ports and SET, to mitigate the risk of modern slavery in SET's operations and supply chains.

The use of TasPorts' various ports is conditional on port users complying with TasPorts' Standard Terms and Conditions of Port Access which are available on TasPorts' website. In this reporting period, TasPorts introduced a modern slavery clause enabling TasPorts to reject an application, or withdraw permission to access, its ports if it becomes aware of any contravention of modern slavery legislation by the owner, charterer and/or manager of the vessel unless they are able to demonstrate to TasPorts that the contravention has been remedied.

In the next reporting period, TasPorts intends to include a modern slavery clause in its leases of land at its various ports.

### POLICIES AND PROCEDURES

TasPorts has introduced a Modern Slavery Policy which applies to the entire organisation (including contractors engaged and undertaking work on behalf of TasPorts). The Policy aims to eradicate modern slavery risks and provide information and guidance to our employees on how to recognise and deal with modern slavery issues.

TasPorts has also implemented a Supplier Code of Conduct which prescribes a set of minimum standards for doing business with TasPorts and is available on its website at [www.tasports.com.au/corporate](http://www.tasports.com.au/corporate). The Code of Conduct enables TasPorts to check compliance with the requirements of the Code of Conduct and encourages its suppliers to implement their own binding guidelines for ethical behaviour.



TasPorts has a number of other policies and procedures which are aimed at combating wrongdoing which will also have the effect of mitigating the risks of modern slavery within its operations and supply chains including:

- Whistleblower Policy;
- Fraud and Corruption Policy;
- Fraud and Corruption Procedure;
- Gifts, Benefits and Hospitality Policy;
- Public Interest Disclosure Policy and Procedure;
- Conflicts of Interest Policy.

TasPorts' Whistleblowing Policy provides an avenue for past and present employees or any other person to anonymously report any wrongdoings including any concerns that they may have in relation to modern slavery. All reports of modern slavery would be fully investigated.

TasPorts' policies are available on its intranet.

## TRAINING

TasPorts has raised awareness within its business in relation to modern slavery by providing updates about the commencement of TasPorts' Modern Slavery Policy, Supplier Code of Conduct and the new modern slavery clauses in its various agreements. In the last reporting period, TasPorts released an article and training video on its intranet for all employees to view. This training was issued to all employees to watch the training video during the reporting period.

TasPorts is considering making this video available in future reporting periods to all contractors as part of the contractor induction program. In the next few reporting years, TasPorts intends to implement additional training via a third-party provider to assist employees negotiating contracts and those working portside who may be able to identify risks of modern slavery from visiting vessels.

## EFFECTIVENESS OF ACTIONS

TasPorts' Board has overall responsibility for ensuring that all those under its control comply with its Modern Slavery Policy.

The General Counsel/Company Secretary has primary and day-to-day responsibility for implementing TasPorts' Modern Slavery Policy, and for monitoring its use and effectiveness. The Policy, and TasPorts' internal control systems and procedures, will be subject to regular reviews to provide assurance that they are effective in countering modern slavery.

TasPorts' internal Audit Risk Management Committee (ARMCo) approves and reviews TasPorts' policies. In future reporting periods, TasPorts' Executive Leadership Team will review the effectiveness of the policies and procedures implemented annually.

In February 2022, TasPorts issued a survey to employees after the completion of the training to ensure that employees understood and retained the information. The results of these surveys indicate that the training was well understood however, TasPorts will continue to provide refresher training with a particular focus on those areas of the survey that were not answered well.

Further, TasPorts will work towards ensuring all employees complete the training. The proposed new training for the next reporting period requires employees complete a learning check either throughout or at the end of the training. The course also requires a set pass rate in order to obtain a certificate of completion. TasPorts will also conduct discussions with key employees to gain insights as to whether they believe that the policies and procedures are working to combat modern slavery in our operations and supply chains and to identify any risks that have not been addressed.

## PROCESS OF CONSULTATION

Senior management from BIL, KIP, FIP and TasPorts were consulted in the preparation of this Statement and the Company Secretary of each of TasPorts' subsidiaries is aware of the content of this Modern Slavery Statement.

This Statement has been approved by the Board of BIL, KIP and FIP and was endorsed by the Board of TasPorts on 15 December 2022.

Stephen Bradford  
CHAIRMAN

