



# MODERN SLAVERY STATEMENT

Financial Year 2022-23

## 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 at King Island but is otherwise a non-operating entity.

Similarly, 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 Financial 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 we take 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 2023.



# 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;
- performing specific regulatory functions within port areas on behalf of Marine and Safety Tasmania and the Crown under a Deed of Agreement; 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

BIL provides a dedicated weekly shipping service between Devonport and Grassby on King Island using the vessel *John Duigan*.

For cargo to/from Melbourne, BIL presently offers a transshipment service via Devonport utilising a Tasmanian owned company with a history of providing Bass Strait shipping services.

BIL commenced operations in April 2017 and caters for the carriage of containerised freight, break-bulk / out-of-gauge cargo, ISO Tanks, vehicle mobile units and livestock trailers.

## SET

Through a joint venture with Qube Ports, SET operate 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.

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 trucks on to the vessel, 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:

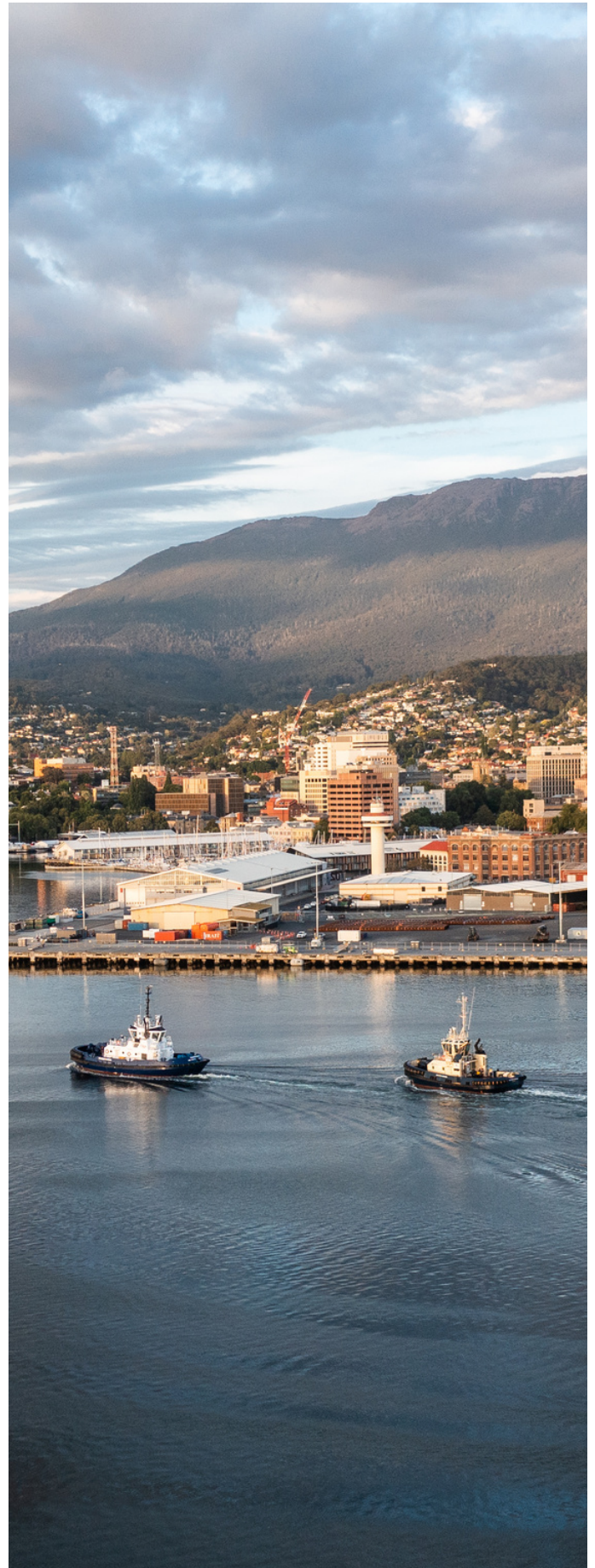
- **Infrastructure Projects** - design and engineering services, project management, construction.
- **Repair and Maintenance of Infrastructure and Assets** - vehicle maintenance, vessel repair and maintenance, wharf and infrastructure repair and maintenance, parts relating to maintaining, repairing 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 2023, TasPorts had just under 300 employees, with 234 of these employees being full time, 29 part time and 30 casual. TasPorts had 43 contractors under labour hire agreement.

### 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 by either 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 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 2022-2023 financial year, TasPorts issued a supplier self assessment survey to its larges:

- 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.



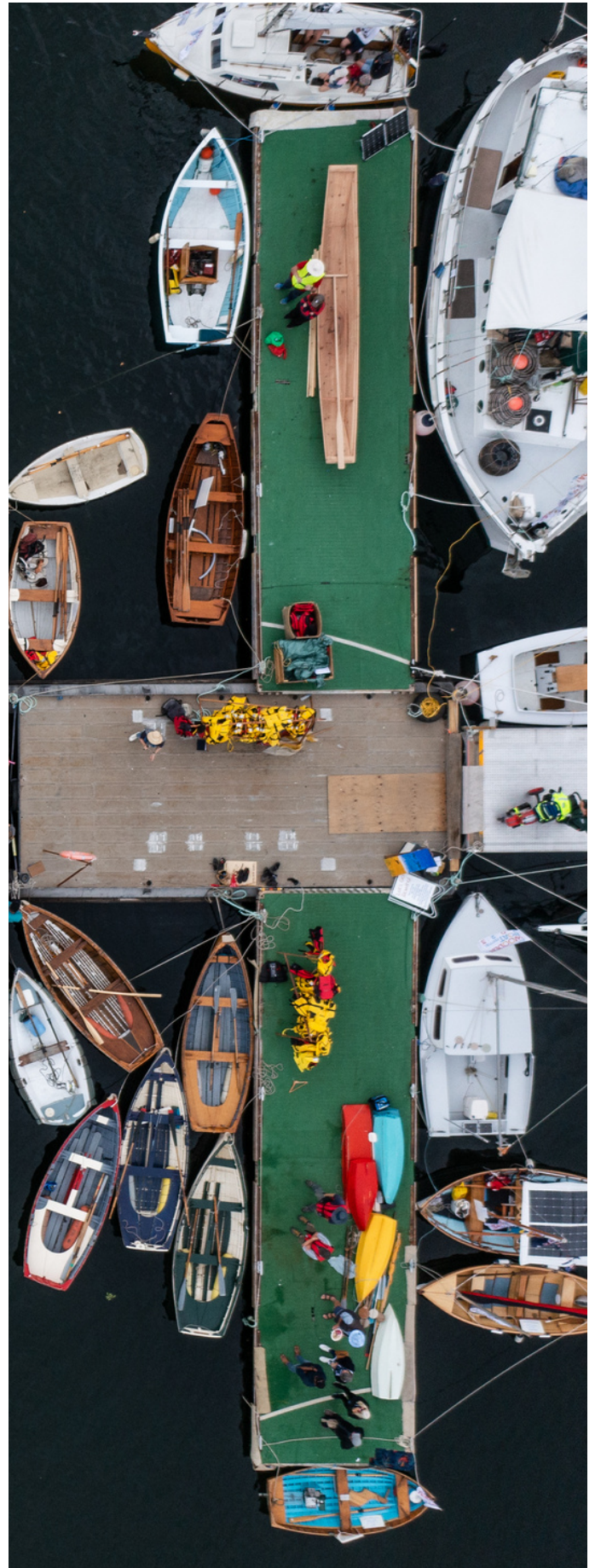
## CHARITABLE/SPONSORSHIP ACTIVITIES

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 collaborates with an organisation dedicated to the welfare of seafarers, operating across several of our ports. This partnership enhances the oversight of seafarer treatment at these locations.

Both TasPorts and the organisation acknowledge the global challenges confronting seafarers, including piracy threats and the adverse impact on the physical and mental well-being of those lacking sufficient access to shore leave and welfare services.

Recognising the pivotal role of shore-based welfare facilities in promoting seafarers' well-being, TasPorts and the organisation actively facilitate connections with support bodies when deemed necessary. This collaborative effort underscores a shared commitment to addressing the unique challenges faced by seafarers worldwide.





## SUPPLY CHAINS

TasPorts paid 951 suppliers in the 2022-2023 reporting period. The majority of these suppliers are Tasmanian based and the remainder (excluding 15 suppliers) are Australian based suppliers (see chart below).

The 15 suppliers based outside Australia involved:

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

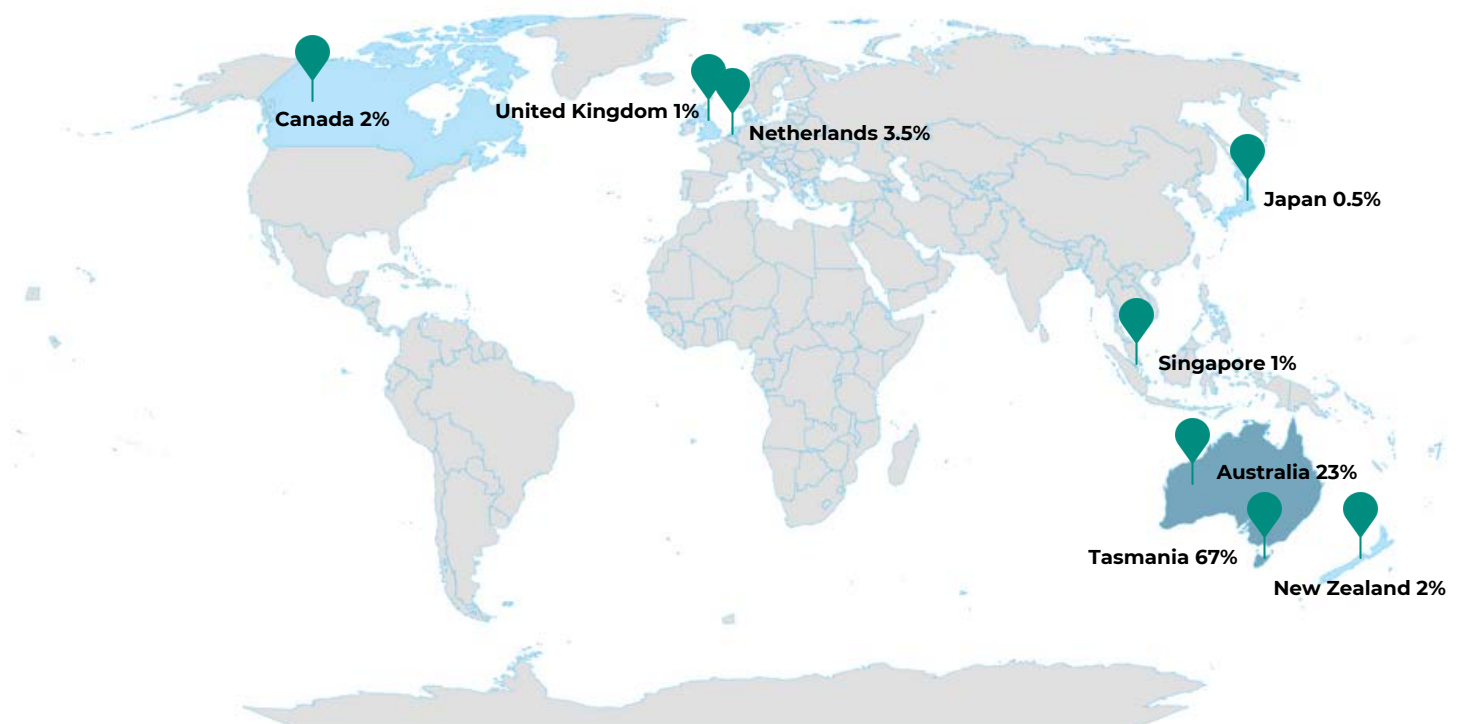
Of the suppliers identified as being based overseas, TasPorts has assessed them as low risk due to the locations and the political, socio-economic and legal factors which are present in these countries which reduce the prevalence of modern slavery. Further, the goods and services purchased from these 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 951 suppliers in the financial year ending 30 June 2023 and TasPorts' review of its additional:

- 165 new suppliers for the financial year ending 30 June 2022;
- 123 new suppliers for the financial year ending 30 June 2023.

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 we enter into are with previously engaged suppliers.



## SUPPLY CHAINS

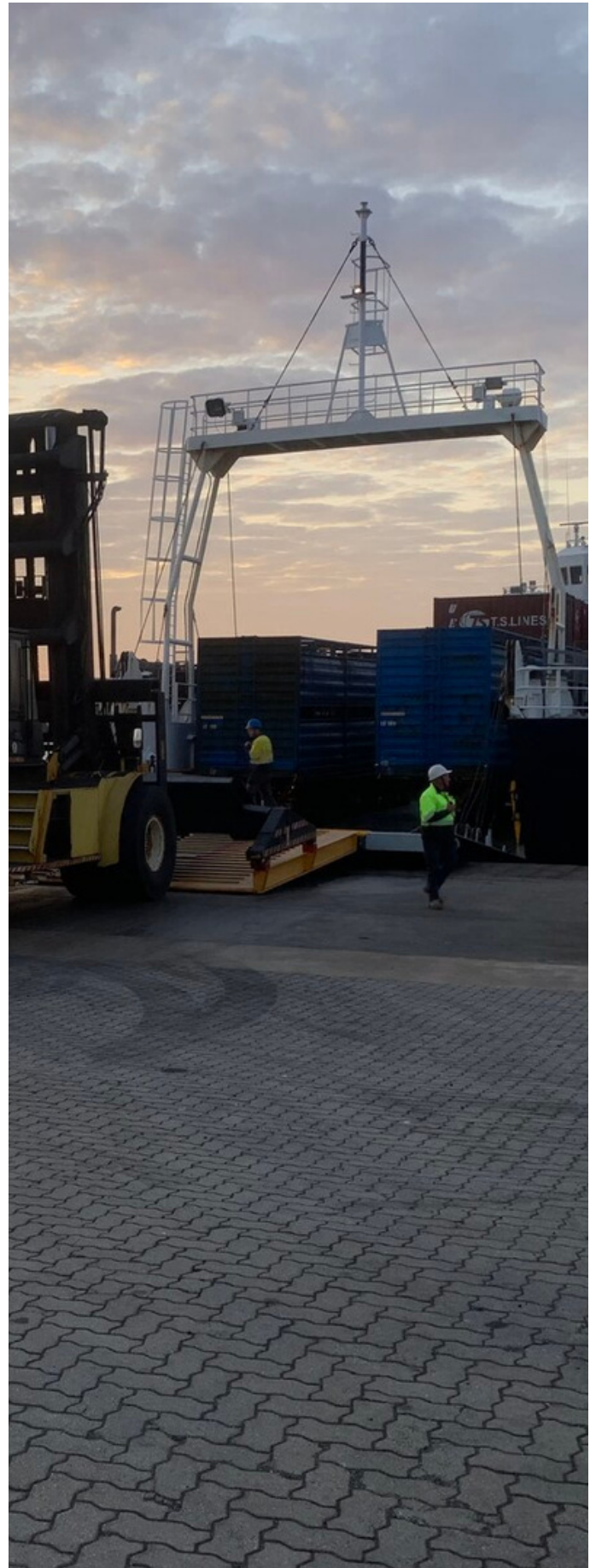
TasPorts has identified the following areas of its supply chain as being at a higher risk to modern slavery practices:

- 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;
- purchase of catering due to the nature of the sourcing of suppliers from the agriculture industry.

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 we 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 Supplier Code of Conduct.





## BIL

BIL paid 26 supplier in the 2022-2023 reporting period. Most of BIL's suppliers were Tasmanian based with the remainder being Australian based.

TasPorts considers the main risk of modern slavery in BIL's operations and supply chains to be in relation to:

- the purchase of parts for the *John Duigan* 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, 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. Further, all crew are required to obtain a Maritime Security Identification Card which includes an accredited background check from AusCheck to have access to a secure port facility.

## SET

SET paid 8 suppliers in the 2022-2023 reporting period, all of which were Australian based. Three suppliers were regulatory bodies.

SET's suppliers at highest risk involved two cleaning service providers.

SET will look to issue a supplier survey to these parties in the next reporting period.





# 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 has enabled TasPorts to prioritise its due diligence processes. In the 2021-2022 financial year, TasPorts issued a supplier self-assessment survey to a number of its suppliers across a selection of these high-risk categories.

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' operations.

To date just over half of these surveys have been returned. The main issues from these surveys are summarised in the following column.

TasPorts' main safety PPE supplier provided TasPorts with a Certificate of Accreditation from Ethical Clothing Australia.

The initiative aimed at assisting local textile, clothing and footwear businesses to ensure that Australian workers making their products receive their legal minimum wages and entitlements and are working in safe conditions.

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



- Based on the surveys returned by TasPorts' suppliers at the end of the reporting period.



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.

In the next reporting period, TasPorts proposes to:

- updates its Vendor Form to include some question to assist with identifying new suppliers that may be at high risk of modern slavery practices in their organisation or supply chain. TasPorts will then consider whether due diligence is required on that supplier; and
- issue a letter to TasPorts' existing vendors including some information on modern slavery, including encouraging TasPorts' suppliers to be aware of and comply with TasPorts' Supplier Code of Conduct.

## BIL

In the previous reporting period, TasPorts issued a supplier survey to the operator of its vessel, being one of the suppliers identified as being a higher risk supplier, to assist in determining the risk of modern slavery occurring within that entity.

The survey results indicated that:

- their crew are all employed under the terms and conditions of the Maritime Union of Australia, which is a negotiated Enterprise Agreement or similar;
- all new crew members are screened prior to being employed to work on BIL's vessel and are provided with a written contract and the organisations policies where the terms of employment including wage rates and hours of work are clear;
- the supplier would organise someone to assist an employee with explaining the terms and conditions of their employment if required;
- they provide training to their employees on modern slavery;
- they have a grievance policy in place; and
- although they do not have their own Modern Slavery Policy, they agreed to comply with TasPorts Modern Slavery Policy.

## 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 with its joint venture partner 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.

TasPorts has included a modern slavery clause in its lease of land at its various ports, as this was identified as a higher risk area due to the proximity of the location to the port. TasPorts has provided a number of its prospective tenants with information about modern slavery and the reason for the inclusion of the clause.

## POLICIES AND PROCEDURES

TasPorts has 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 also has 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 Supplier Code of Conduct enables TasPorts to check compliance with the requirements of the Supplier Code of Conduct and encourages its Suppliers to implement their own binding guidelines for ethical behaviour.

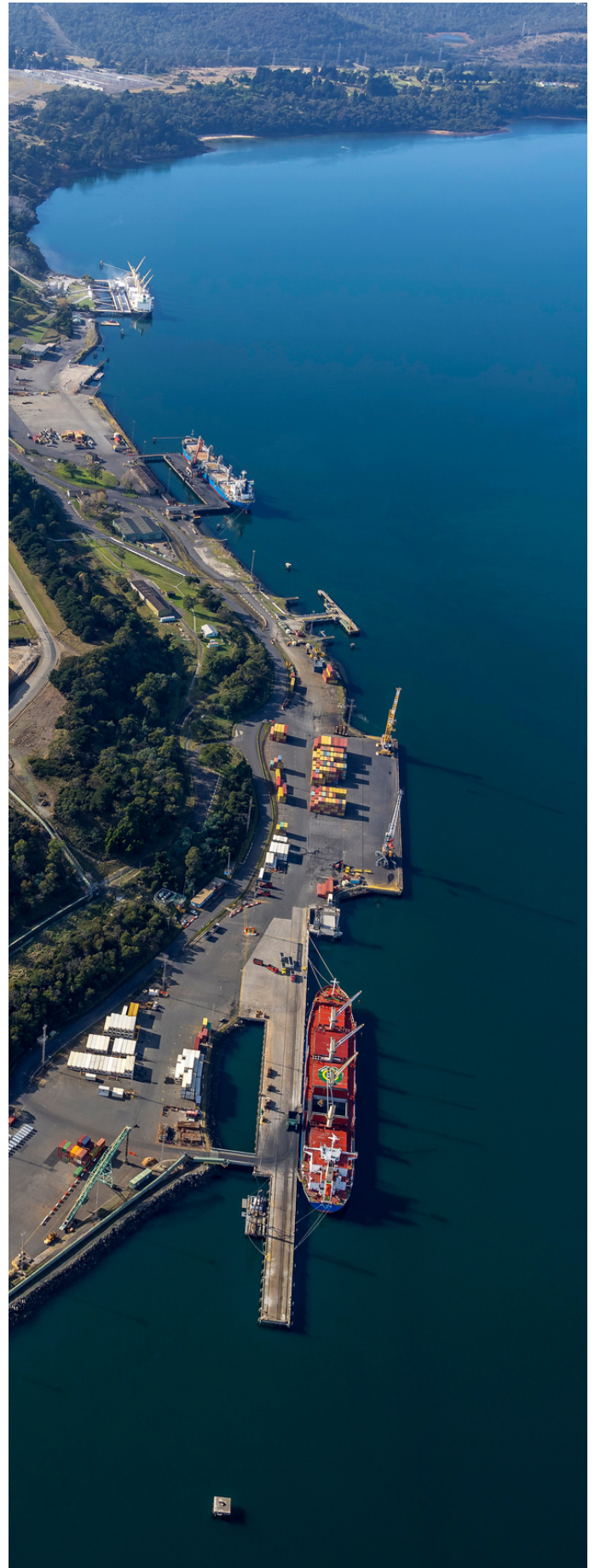
TasPorts has a number of other policies and procedures which are aimed at combating wrongdoing which will also have the effect of mitigating the risks of modern slavery within its operations and supply chains including:

- Whistleblower Policy;
- Fraud and Corruption Policy;
- Fraud and Corruption Procedure;
- Gifts, Benefits and Hospitality Policy;
- Public Interest Disclosure Policy and Procedure; and
- 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 and the Whistleblower Policy is available on its website.

In the next reporting period, TasPorts proposes to issue a reminder to its suppliers that it has a Supplier Code of Conduct and encourage its suppliers to comply with the Code.





## 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 2020-2021 reporting period, TasPorts released an article and training video on its intranet for all employees to view.

Considerable time has been spent this reporting period in issuing a series of reminders, including emails, to specific individuals to watch the training video. The video has been listed as part of the new starter induction program to ensure that new employees do not miss out on the training.

Additional in-person training with a port specific focus (including a list of potential signs of modern slavery on vessels, as well as how to report concerns about modern slavery on vessels) was included as part of TasPorts HR & Governance Roadshow held earlier in 2023. TasPorts required all employees to attend the Roadshow training in person, or watch a video of it and a record of attendance has been kept.

TasPorts recognises its ports are a potential entry point into Australia for trafficking people and that crews on board some vessels using its ports may be forced to work in sub-standard conditions. Considering this increased risk onboard vessels, TasPorts has ensured that all of its pilots have now viewed both the training video and also participated in the Roadshow training.

In the new 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. The Modern Slavery Policy and Supplier Code of Conduct was reviewed and updated earlier in 2023.

TasPorts has issued a survey to employees after the completion of the training to ensure that employees understood the training and retained the information. Employees were followed up and reminded to complete the survey throughout the year, which saw an increase in the number of surveys completed.

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 as well.

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 21 December 2023.



Stephen Bradford

CHAIRMAN

