



MODERN SLAVERY STATEMENT 2025

ACKNOWLEDGEMENT OF COUNTRY

Southern Ports acknowledges the Whadjuk, Wardandi, Menang and Wudjari people as the Traditional Custodians of the lands and waters on which we operate and their continuing connection to land, waters and community. We pay our respects to Elders past and present, and extend that respect to all Aboriginal communities.



STATEMENT OF COMPLIANCE

In accordance with section 16 of the *Modern Slavery Act 2018* (Cth) this Statement outlines Southern Ports' commitment to managing relevant modern slavery risks in its operations and supply chains for the year ended 30 June 2025.



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From the Chair and CEO



As the port authority responsible for Australia's three southwestern ports at Albany, Bunbury and Esperance, Southern Ports plays a critical role in the nation's trade network. While the reach of our supply chains is broad, our focus remains local – supporting regional industries in mining, agriculture, energy and forestry to share their products with global markets.

Each year, more than 30 million tonnes of trade moves through our ports, made possible by the close partnerships we maintain with our suppliers and wider port communities. Our vision of *strong regional ports, strong regions* continues to guide us, and we're proud that over 44 per cent of our suppliers are based within our regions. Supporting local businesses wherever we can is one of the ways we help our communities grow.

But we also recognise that the size and complexity of our supply chains mean not all suppliers can be as close to home. With that comes a responsibility to manage potential risks – including the risk of modern slavery. Southern Ports takes this responsibility seriously. We have a firm, zero-tolerance approach and are committed to ensuring our operations and relationships uphold the highest ethical standards.

We have made significant progress in implementing our modern slavery controls and are actively applying them across our supply chain. Our commitment is clear: we want to lead by example. We aim to be a regional and industry leader in identifying and preventing modern slavery, ensuring fair and safe working conditions for everyone who contributes to our success.

As we move forward, we will continue to take meaningful action to strengthen our practices and lead with integrity, ensuring our ports, our regions and our people thrive together.

Ian Shepherd
Chair

Keith Wilks
Chief Executive Officer

About Southern Ports

Southern Ports is a Western Australian Government owned port authority working across four sites at Albany, Bunbury, Esperance and Perth.

We underpin the state's economic growth and play a pivotal role in facilitating more than 30 million tonnes of trade each year. While we predominantly operate bulk export ports, our role in facilitating critical imports including project cargo and supporting cruise tourism is ever increasing.

We work with our customers and port users to find solutions, connecting regional industries to global markets.

Our trade facilitation is enabled by our commitment to our people and our internationally recognised asset management system, which covers our diverse infrastructure portfolio of 8,700 assets.

Beyond trade, Southern Ports is an integral part of our communities – building capacity and creating prosperity for our regions to deliver on our vision of *strong regional ports, strong regions.*



OUR OPERATIONS

3 PORTS

4 REGIONS

30.18mt
total trade

40
commodities

746
vessel visits

58 trading customers

312
people

79%
regionally-based staff

OUR PORTS



PORT OF ALBANY

The Port of Albany is located on Menang Boodjar, 400 kilometres south of Perth, within the Great Southern region of Western Australia. The gateway port offers four berths, leases for port-related industries, and access to port infrastructure and facilities.

Adjacent to the city of Albany, the Port encompasses a landholding of 84 hectares surrounded by the waters of Princess Royal Harbour and King George Sound. As Western Australia's oldest port, it is historically significant to the region and state.

Key commodities include grain, woodchips, silica sands and fertiliser.

The Port is also a premier cruise ship destination with significant heritage and tourism offerings, and has a strong environmental and sustainability focus.



4.9mt trade



152 vessel visits



37 people



PORT OF BUNBURY

Located on Wardandi Boodjar, 175 kilometres south of Perth in the waters of Koombana Bay, our Port of Bunbury is a gateway port with seven active berths. It provides leases for port-related industries and access to port infrastructure and facilities.

The diverse commodities traded through the port extend to alumina, grain, spodumene, caustic soda, woodchips, mineral and silica sands, copper concentrate, coal, fertiliser and fuel. The Port also welcomes cruise vessels and has laydown capacity for breakbulk and project cargo.

Optimally located in the South West region and with a large landholding of 470 hectares, the Port is also primed for growth.



17.1mt trade



423 vessel visits



86 people



PORT OF ESPERANCE

The Port of Esperance is located on Wudjari Boodjar, approximately 720 kilometres east-southeast of Perth in the Goldfields-Esperance region and within the waters of Esperance Bay.

Our Port of Esperance is a gateway port offering full port and terminal services with three berths and a landholding of 75 hectares.

The Port is the only deep-sea port in southern Western Australia.

The second-largest employer in the region, the Port has a diverse trade profile with iron ore, grain, spodumene, fuel, sulphur, woodchips, fertiliser, copper concentrate and nickel, as well as containers and cruise ships.



8.2mt trade

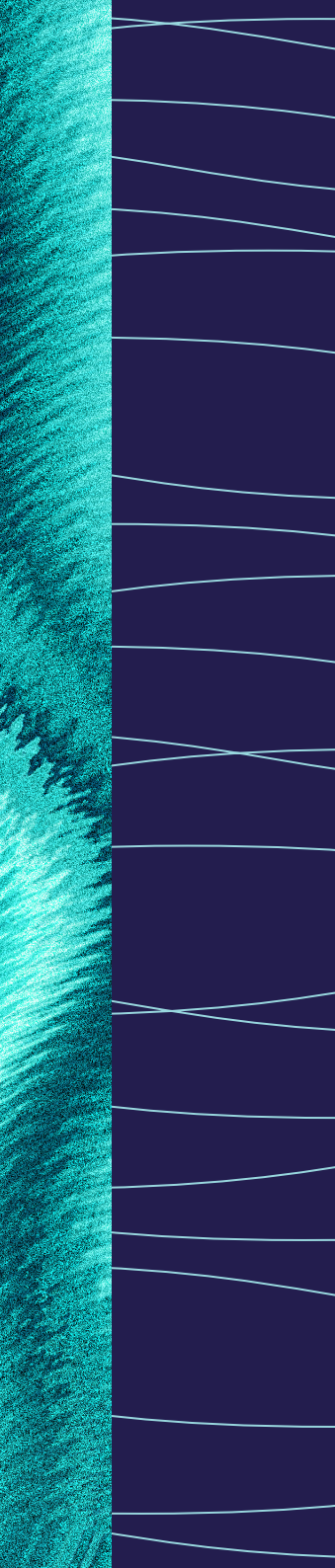


171 vessel visits

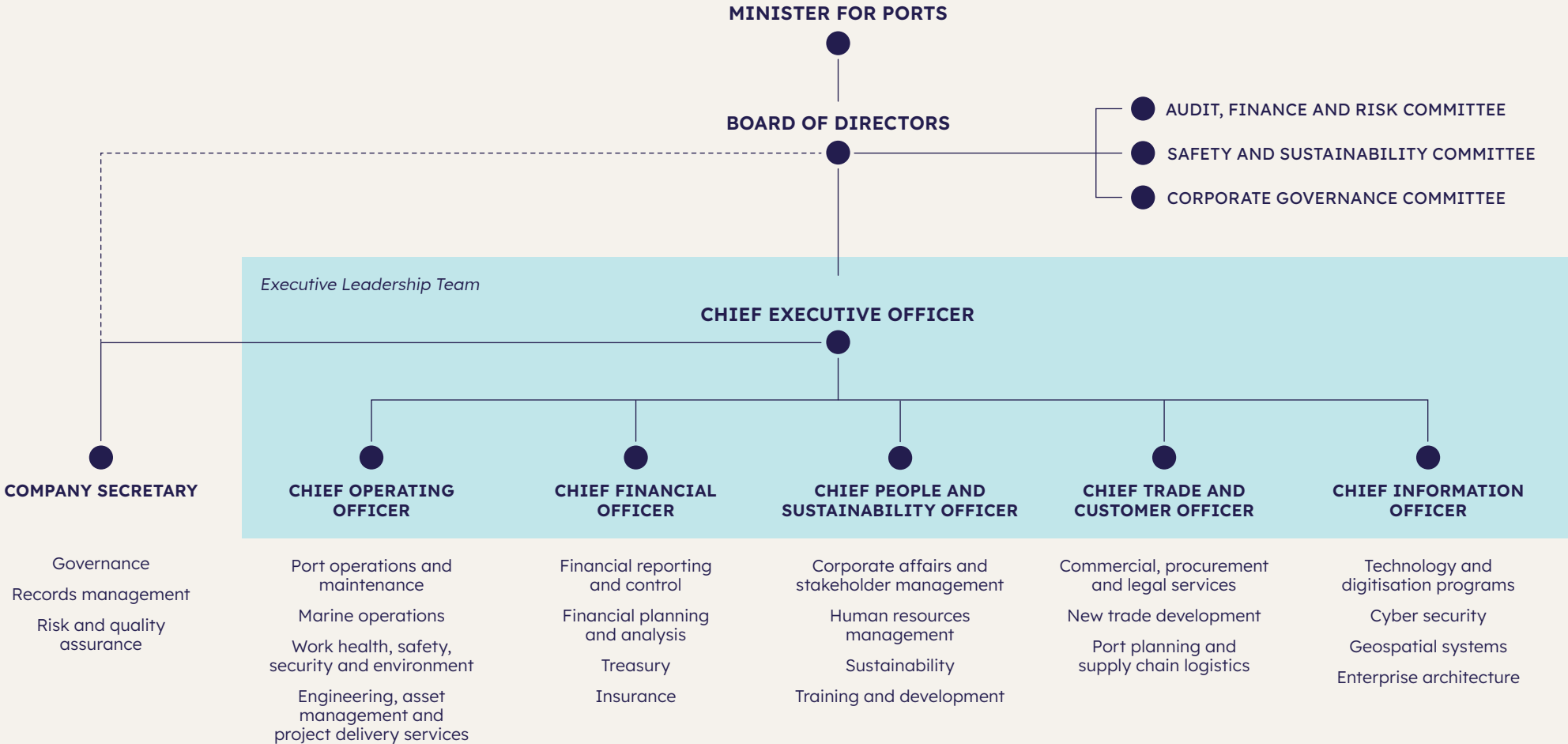


125 people





OUR ORGANISATION



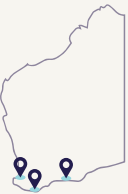
OUR SUPPLY CHAIN

Suppliers

Supply scope



1,001
SUPPLIERS
ENGAGED



441
REGIONAL¹
SUPPLIERS

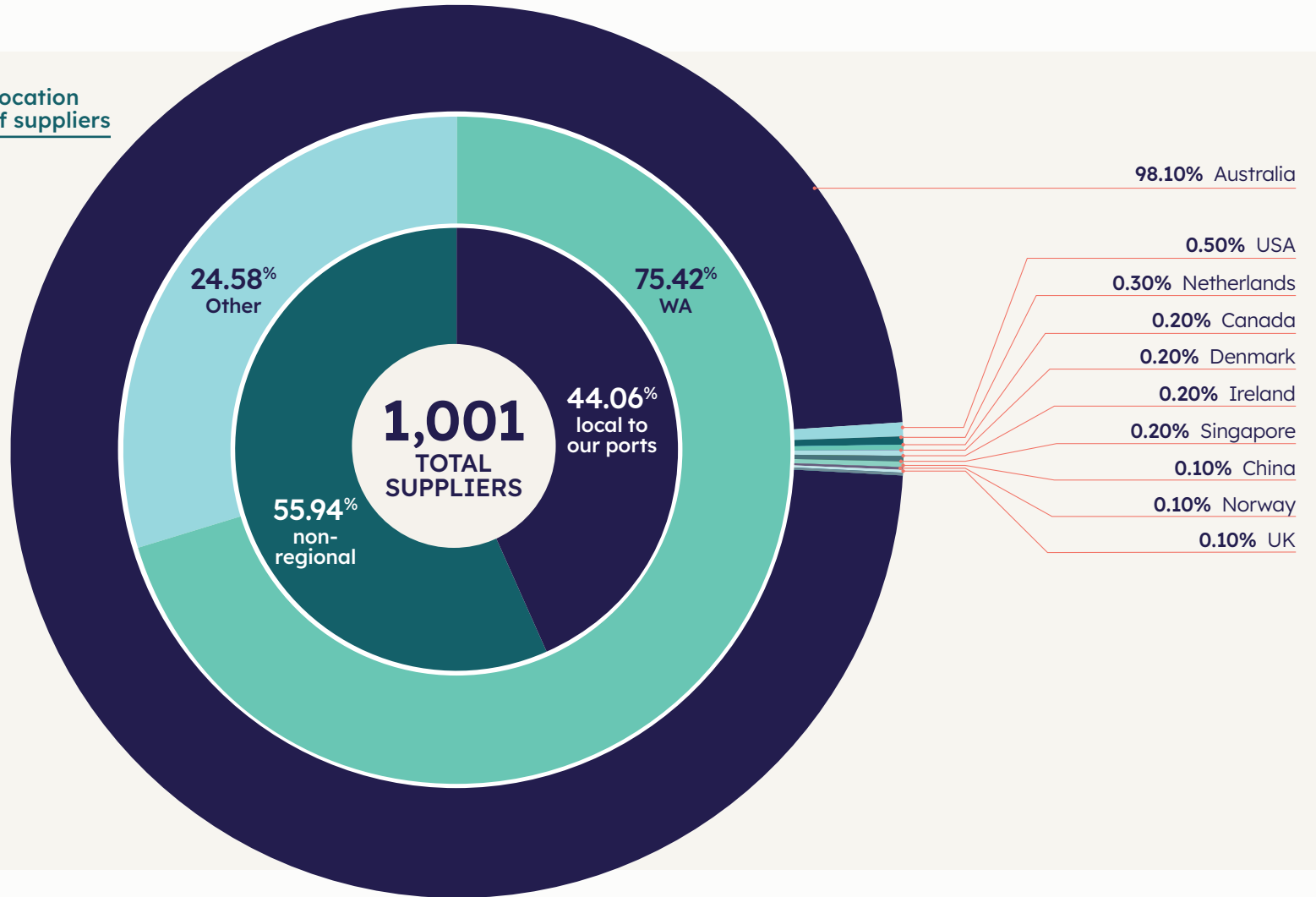


7.09%
SUPPLIERS
report under *Modern
Slavery Act 2018* (Cth)

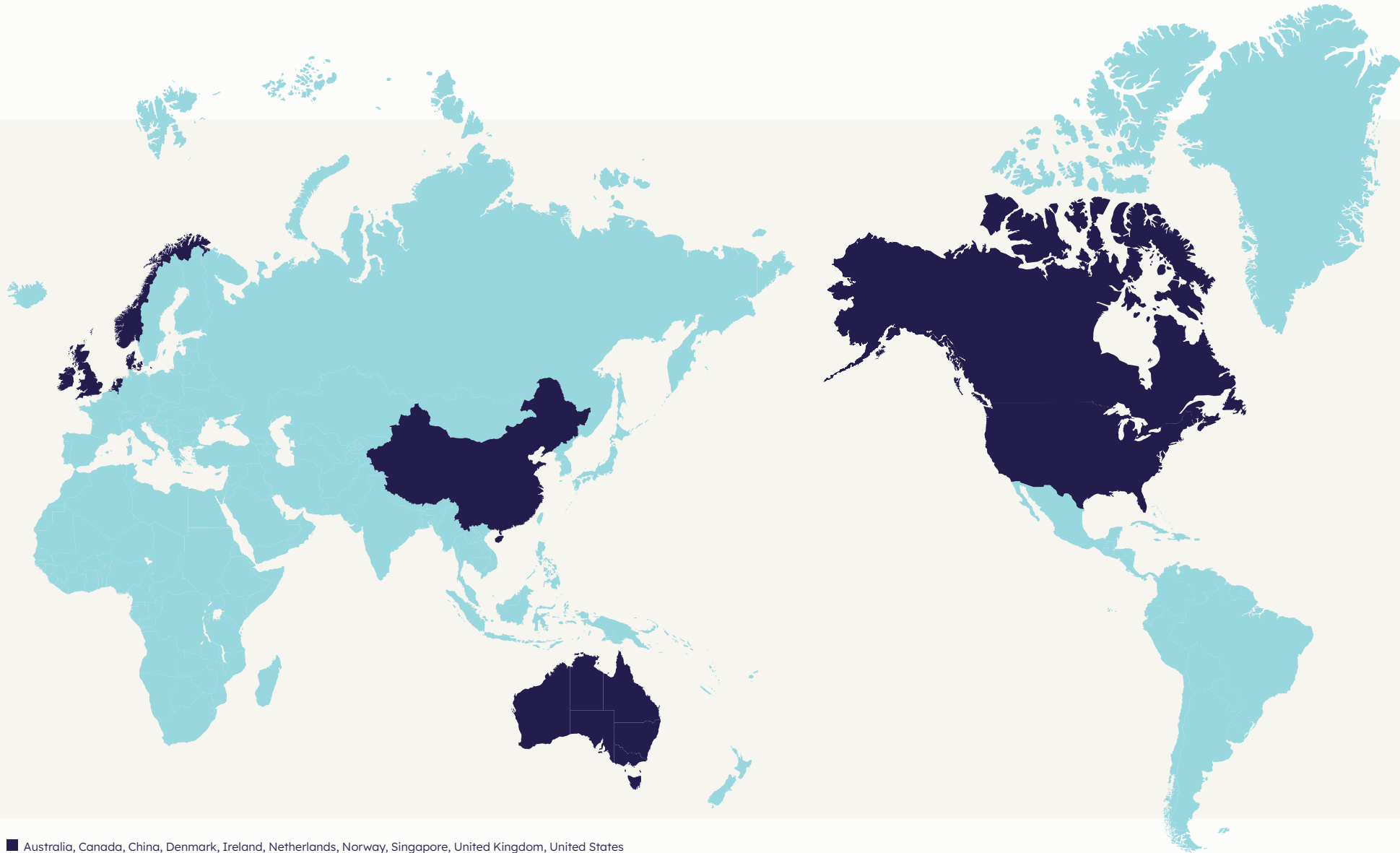


0
NUMBER OF
SUPPLIER-REPORTED
modern slavery incidents

Location of suppliers



¹ As per regional contract criteria outlined in WA Buy Local Policy 2022



■ Australia, Canada, China, Denmark, Ireland, Netherlands, Norway, Singapore, United Kingdom, United States



TWT0016

FOUNDEX
C/L - CONTRACTOR
Noise Reduction Barrier

Noise Reduction Barrier



FOUNDEX
C/L - CONTRACTOR

FOUNDEX
C/L - CONTRACTOR

WOODCHIP TRUCKS

PORT TRAFFIC

FOUNDEX
C/L - CONTRACTOR

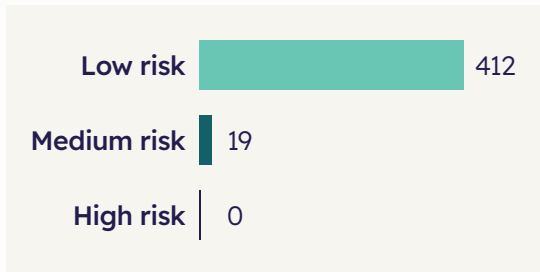
Modern slavery risk

The types of goods and services procured by Southern Ports comprise:

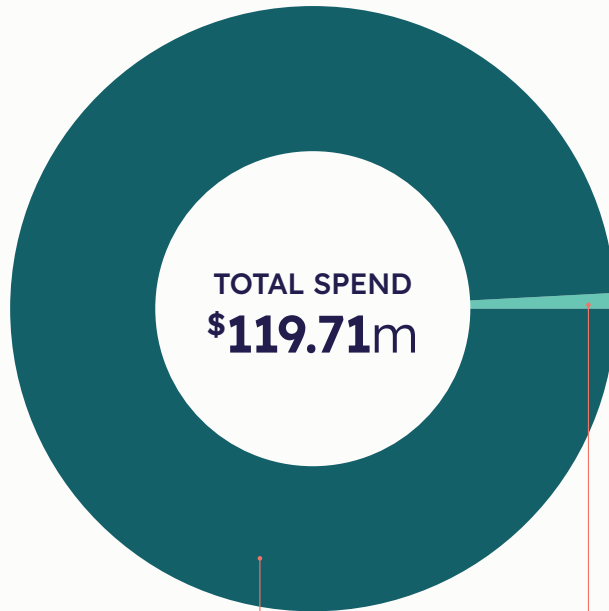
- port infrastructure
- industrial equipment
- facilities services
- business advisory services
- technology and data management
- third party contracts or licences

These goods and services are generally lower risk for modern slavery as they often involve skilled labour, regulated industries or established suppliers, mitigating the likelihood of unethical practices.

This period, Southern Ports assessed 431 (or 43 per cent) of our active suppliers for modern slavery risk, with the following risk levels applied:



Supplier spend by location



DOMESTIC SUPPLIERS
99.21%
\$118.76m

INTERNATIONAL SUPPLIERS
0.79%
\$0.95m

Country	Value (AUD)	%
Australia	118,759,836	99.21
UK	293,279	0.25
Ireland	264,768	0.22
Singapore	150,530	0.13
Netherlands	132,478	0.11
USA	67,090	0.06
Canada	23,818	0.02
Denmark	9,637	0.01
Norway	8,898	0.01
China	4,185	<0.01

Our commitment



Modern slavery is a growing issue that impacts almost 50 million people globally. The most vulnerable are women, children and migrants.¹

Often hidden in plain sight, the term modern slavery is used to describe circumstances where people are tricked, coerced, or forced into exploitative situations that they cannot refuse or leave, ultimately removing their freedom.¹

Australia is ranked in the top three governments taking action¹ on modern slavery and Southern Ports is proud to be part of that action.

Reducing risk around modern slavery is a priority for our business, and part of our commitment to sustainability and connecting our regions to the global marketplace.

Southern Ports takes a zero-tolerance approach for any of its suppliers found to be engaging in modern slavery practices and undertakes due diligence to assess the risks that suppliers may have in their operations and supply chains.

We acknowledge that as a port authority, we work with a broad range of stakeholders, each with their own level of modern slavery risks. While we aim to lead by example and be a strong advocate, we are mindful that our sphere of control relates to our procurement of goods and services, employment conditions and our working relationship with seafarers visiting our ports.

We are committed to maintaining a high standard of ethical conduct in our business. This is guided by our policies, procedures and standards that set out the expectations of our employees and third-party stakeholders to act in an ethical and honest manner.

These include, but are not limited to:

- Code of Conduct and Ethics Policy
- Contracting Terms and Conditions
- Declaring a Conflict of Interest Procedure
- Equal Opportunity, Diversity and Inclusion Plan
- Fraud and Corruption Prevention Control Framework
- Fraud and Corruption Prevention Management Standard
- Gift, Benefit and Hospitality Procedure
- Grievance Procedure
- Health and Safety Policy
- Integrity Framework
- People and Culture Policy
- Port Information Guide
- Procurement and Contracting Standard
- Respect at Work Procedure
- Risk Management Policy
- Sustainable Development Guidelines
- Sustainability Plan
- Whistleblowing Management Direction

¹ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

Risks for Southern Ports

As a port authority that connects our regional industries to global markets, there are four key categories of modern slavery risks. Where a supplier or product carries risk across multiple categories, there is a higher likelihood that modern slavery practices are taking place and require Southern Ports to act.

	<p>Geographic risks Certain countries have a higher risk of modern slavery due to corruption, displacement, and socio-economic factors like poverty.</p>
	<p>Sector and industry risks Certain sectors are known to have higher risks because of their characteristics, products and processes. Typically these sectors are unregulated and may involve seasonal, low-paying, low-skilled or dangerous/hazardous work.</p>
	<p>Product and services risks Certain products have a higher risk because of the way they are produced, provided or used.</p>
	<p>Supply chain model risks Supply chains consider everyone from our employees to our direct and indirect suppliers. The larger the supply chain, the harder it can be to identify and monitor modern slavery practices. Sub-contracting and the use of labour recruiters in the supply chain also increases risks of modern slavery, especially where recruitment fees are charged.</p>



Geographic risk snapshot

Country	Suppliers engaged (%)	Total Government Response to Modern Slavery (%) ²	Total Vulnerability Score to Modern Slavery (%) ²	Risk rating
Australia	98.10	67	7	Low
USA	0.50	67	25	Low
Netherlands	0.30	67	6	Low
Canada	0.20	60	11	Low
Denmark	0.20	62	6	Low
Singapore	0.20	47	24	Low
Ireland	0.20	63	9	Low
China	0.10	40	46	Moderate
Norway	0.10	63	1	Low
UK	0.10	68	14	Low

Table 1: Global Slavery Index 2023 Data by Country

¹ Walk Free (2023) The Global Slavery Index 2023, Minderoo Foundation

Risk type	Risk category	Potential risk	Assessed risk profile	Southern Ports' response
Geographic risk	International suppliers	For Southern Ports, geographic risks can be relevant for any products that come from moderate and high risk countries as defined by the Global Slavery Index such as China, India, Peru and Malaysia.	Low	<p>More than 98 per cent of Southern Ports' suppliers are based in Australia.</p> <p>The remaining 1.9 per cent are based internationally including Canada, China, Denmark, Ireland, Netherlands, Norway, Singapore, United Kingdom and United States.</p> <p>Half of these countries of origin have modern slavery legislation which helps to minimise risks. The majority have a 'low' geographic risk rating, except for China which has a more moderate risk rating of modern slavery in its supply chains.</p>
Product and services risk	Personal protection equipment (PPE) and branded merchandise	<p>At Southern Ports, the products that have the highest risk for modern slavery are corporate branded merchandise and PPE.</p> <p>Industries that produce these materials are labour-dependent with each piece travelling through a complex supply chain which has a lack of visibility. Forced labour, minimal pay, lack of worker's rights and social benefits and long hours may be a factor in these industries.</p>	Low	<p>When procuring materials and suppliers, several controls are in place to identify and address risks of modern slavery and to support our broader commitment for conducting ethical business:</p> <ul style="list-style-type: none"> • Procurement and Contracting Standard • Risk Value Assessment • Felix onboarding process • Supplier Onboarding Questionnaire • Modern Slavery contractual provisions • Category Specialists and Buyer roles • Projects and Procurement Governance Committee (PPGC) and procedure • Technology Governance Committee and procedure • Adherence to government policies and participation in associated initiatives included the Aboriginal Procurement Policy, Australian Disability Enterprise Initiative, Western Australian Buy Local Policy 2022, Western Australian Industry Participation Strategy (WAIPS) and the Building Construction Industry Training Fund (BCITYF) levy.
	Technology equipment and support services	<p>Electronics like laptops and mobile phones are some of the technological equipment at Southern Ports that may present modern slavery risk.</p> <p>In recent years modern slavery has been exposed in big technological supply chains⁷ relating to debt-bonded labour, forced labour and unethical mineral sourcing.</p>	Low	
	Renewables	<p>As part of our sustainability commitment, Southern Ports continues to explore solar panels and other renewables for our facilities.</p> <p>An increasing link between renewable energy supply chains to modern slavery has surfaced over recent years due to slave labour in mineral extraction and manufacturing in China, Africa and South America.</p>	Low	
	Building materials and engineered components	<p>Southern Ports continued to invest in maintaining and growing its infrastructure and asset base during the reporting period.</p> <p>The consumables, parts and components that support this asset maintenance – along with port operations and capital projects – are often only accessible from international manufacturers in high-risk countries and/or geographies within constrained working condition controls.</p>	Low	

⁷ Informed365 (2022) Modern Slavery Exposed in Big Tech Supply Chains, Informed365.

Risk type	Risk category	Potential risk	Assessed risk profile	Southern Ports' response
Sector and industry risks	Facilities management services	<p>We procure facilities management services from security, cleaning and waste management services.</p> <p>These services are typically at higher risk of modern slavery due to a high level of subcontracting, reducing oversight of employee working conditions. These industries also employ a greater representation of people from vulnerable populations such as base-skilled workers, workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds.</p>	Low	<p>Facilities management services are procured through a tender-based process with modern slavery terms and conditions in place.</p> <p>The majority of these suppliers are based locally and operate under modern slavery legislation which provides increased awareness of supply chain risks.</p>
Supply chain model risks	Workforce	<p>Southern Ports employs 312 people, with 100 per cent of this workforce employed within Australia, 79 per cent regionally based, and 81 per cent being permanent employees.</p>	Low	<p>Southern Ports engages all employees under appropriate common law contracts of employment or applicable awards and/or registered enterprise agreements.</p>
	Contractor labour	<p>Contractor labour, particularly in the property and construction industry, can have a high risk of modern slavery due to the high demand for base-skilled labour workforce who are often vulnerable to exploitative practices, poor visibility over long and complex supply chains and low-tier suppliers operating in high-risk geographies.</p> <p>Business models within the sector tend to be heavily based on outsourcing which increases the complexity of operations and supply chains.</p>	Low	<p>All contractors abide by minimum wage laws, and where relevant applicable awards and/or registered enterprise agreements.</p>
	<p>Seafarer welfare <i>This risk is outside of Southern Ports' operational and supplier obligations</i></p>	<p>The seafaring industry can be complex and inconsistent due to differing employment arrangements (separate crew agents, ship operating companies and vessel managers).</p> <p>Regulation and oversight of seafarer welfare can also be fragmented due to the global nature of the industry.</p> <p>Exploitation issues can include bullying and harassment, refusal of shore leave, untreated injuries, no access to fresh food, withholding of wages, withholding of identification documents and overtime.</p>	Low	<p>Southern Ports welcomes more than 16,000 seafarers to its ports each year.</p> <p>While seafarer welfare risks are outside of Southern Ports' operational and supplier obligations, we take a collaborative approach, seeing the responsibility as a shared one.</p> <p>Southern Ports' goes above and beyond to improve seafarer welfare across several initiatives including providing Wi-Fi connections to seafarers enabling communication with loved ones, mental and physical health initiatives and shore leave opportunities.</p>

How we assess risk

The level of risk of modern slavery depends on a range of intersecting contextual factors.

Southern Ports' has modern slavery controls in place through its assessment of suppliers against the Australian Government's procurement modern slavery framework which takes into account four key categories to determine the overall level of risk.

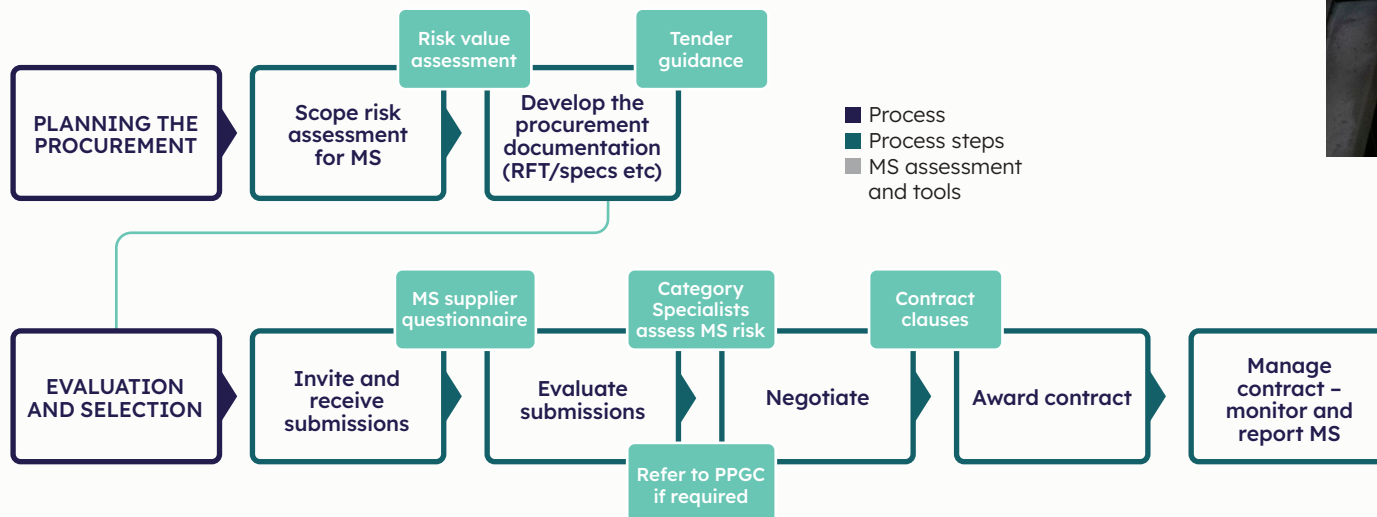
Where a single supplier or product carries risk among multiple categories, the higher the chance that modern slavery practices may be in place, which requires Southern Ports to examine carefully before proceeding.

We take a risk-based approach, and assess high risk parts of our supply chains by:

- requesting information direct from our suppliers about sub-suppliers including country of origin;
- commencing engaging with suppliers to understand how they are addressing their modern slavery risks through a Supplier Onboarding Questionnaire; and/or
- reviewing existing credible assessments of entities as part of the Australian Government's online modern slavery register.



Modern Slavery (MS) controls in procurement processes



Our actions

In 2025 Southern Ports continued to increase awareness and identify modern slavery risks through our supply chains, advocate for the rights of vulnerable groups, and improve our systems and processes.

GOVERNANCE

Procurement specialists

A restructure of the procurement team in 2024 established dedicated Category Specialists, now fully embedded in Southern Ports' approach to managing modern slavery risks and serving as a critical line of defence.

The approach ensures that risk awareness and expertise is embedded across all areas of procurement. The Category Specialists bring a deeper understanding of potential modern slavery risks within their categories, strengthening our ability to identify and address issues proactively.

There also continues to be a strong focus on individual purchases across the business from the procurement support team, offering further oversight and risk reduction in relation to modern slavery.

Technology governance

The introduction of a new Technology Governance Committee and framework at Southern Ports has ensured a consistent approach to the purchase of technology to effectively engage with stakeholders and manage risks including compliance with legal, contractual and policy requirements relating to technology.

SYSTEMS

Supplier pre-qualification

As part of Southern Ports' strategic ambition to drive transformation through technology-enabled ports, new supplier pre-qualification software (Felix) was developed. This system and its supporting processes are now embedded, increasing our supplier due diligence and oversight of modern slavery risks within our supply chains.

Using a Supplier Onboarding Questionnaire against our assessment framework, Felix identifies any suppliers that could carry risk.

PEOPLE

Equity and diversity

Southern Ports fosters a workplace where all employees are treated with dignity and respect.

Our Equal Opportunity, Diversity and Inclusion Plan guides how we remain free from racial and sexual harassment and employment practices that are biased or discriminate unlawfully against employees, and supports our growth in workforce diversity.

In February 2025, we also adopted a new Respect at Work Procedure, providing stronger protection for our people from harassment, discrimination, workplace bullying and unfair treatment in the workplace.

We know that within modern slavery, women are one of the most vulnerable groups. We continue to take a leading role to improve gender equity in our sector through our:

- Women in Leadership program, now in its third year, which has supported the development of 27 women this period, and 41 women since the program's inception.
- progression of gender equity, with female workforce representation increasing to 28.5 per cent this period, and a slight uplift in women holding leadership roles.
- continued learnings through our membership of CEOs for Gender Equity.



SEAFARERS

Seafarers play a vital role in the maritime industry and global trade network.

As an organisation that puts people first, we believe that every seafarer deserves to feel safe, valued and respected in their place of work and we take an active stance in advocating for improved seafarer welfare.

In 2025, Southern Ports directly invested more than \$80,000 in Mission to Seafarers, Stella Maris and the Australian Council of the Mission to Seafarers.

We also supported a volunteer drive for Mission to Seafarers in Esperance, and provided buses and bicycle fleets to the Mission and Stella Maris to enable transport for the more than 16,000 seafarers who visit our ports. This year, two new Wi-Fi boxes were purchased for seafarers at our Port of Albany.

Three of the 18 Port Welfare Committees across Australian ports are those at Southern Ports' ports. We actively contribute to these committees, which bring together Mission to Seafarers, Stella Maris, Australian Maritime Safety Authority, port customers, contractors, shipping agents and the International Transport Workers Federation.

Progress and future focus

Southern Ports is committed to reducing risk of modern slavery in its supply chains through identification and mitigation of risks and raising awareness through advocacy.

Action area	2025 outcomes	Future focus
GOVERNANCE AND REPORTING		
Modern slavery risk dashboard	Procurement dashboard created, inclusive of modern slavery KPIs.	Reporting improvements to Projects and Procurement Governance Committee and the Audit, Finance and Risk Committee through dashboard reporting.
Whistleblower enablement		Review of current whistleblower policies and training to extend to cover modern slavery.
Policies and procedures	New Procurement Standard drafted, inclusive of modern slavery clauses and mitigation methods. Respect at Work Procedure adopted.	Approval and adoption of new Procurement Standard.
SYSTEMS		
Supplier screening	Felix supplier system fully operational, inclusive of screening new and existing suppliers to identify modern slavery risks relevant to their profiles and associated procurement packages. Assessment of 431 (43%) of Southern Ports' suppliers, with risk ratings applied. Approved supplier lists established for most categories of expenditure, with successful modern slavery pre-qualification a prerequisite.	Continue to progress supplier onboarding and establish approved supplier lists, including the application of risk ratings. Mature supplier modern slavery incident reporting and remediation process.
EDUCATION, AWARENESS AND ADVOCACY		
Modern slavery awareness and identification	Procurement awareness training undertaken with contract holders, including modern slavery considerations.	Training and educational messaging across the business to increase modern slavery risk awareness and understanding across the business.
Port Welfare Committee reach	Funding and initiatives to support improved seafarer welfare, including partnering with port users and other Port Welfare Committee members for Day of the Seafarer and holiday periods.	Explore additional opportunities to partner with port users on port welfare committees to raise awareness of modern slavery in the seafaring industry, and increase seafarer welfare to assist our port users to fulfil their obligations and protect those most vulnerable within the global maritime sector.

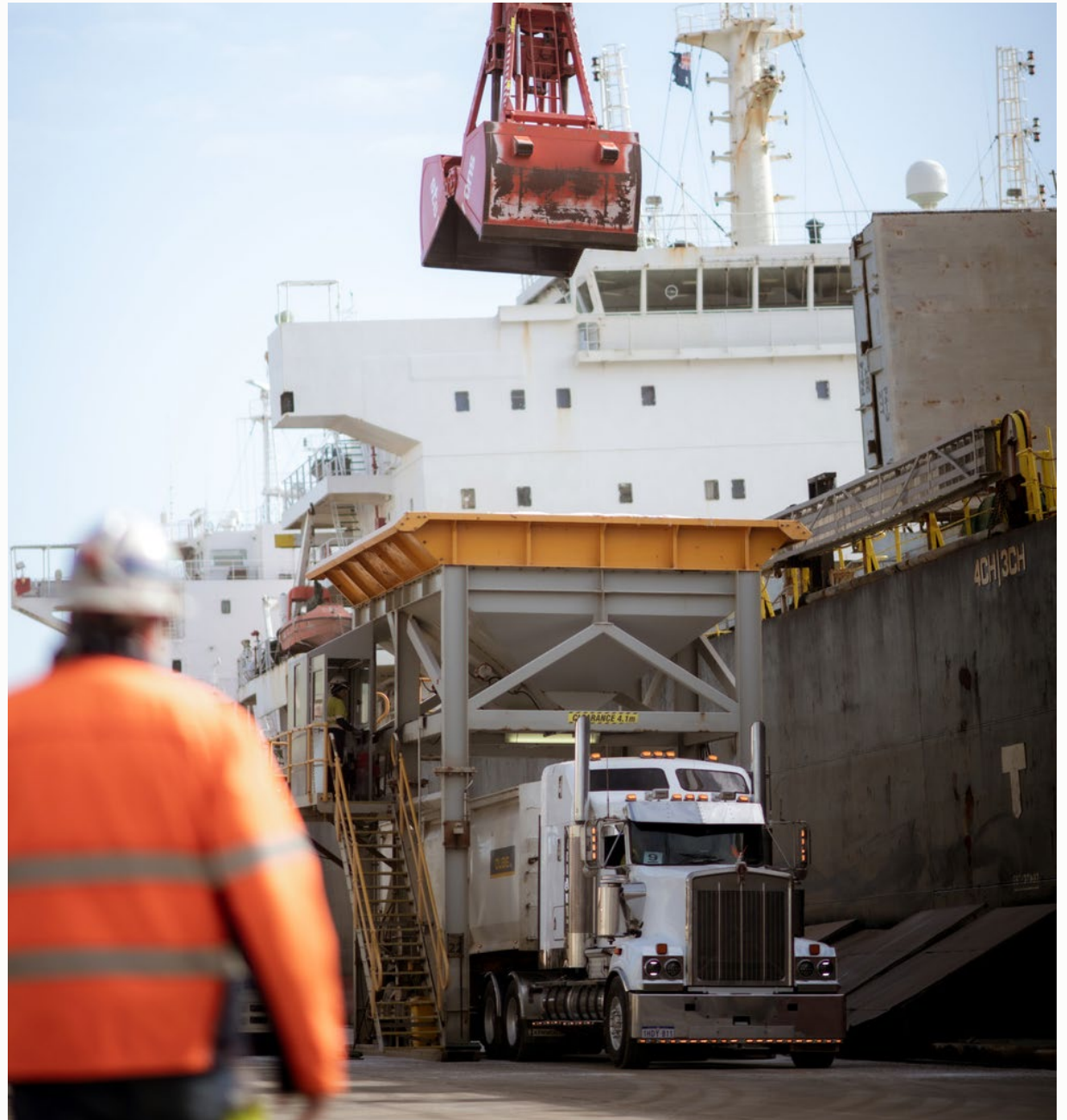
Measuring our actions

Southern Ports monitors the effectiveness of our processes, procedures and actions annually to address modern slavery risks within our business and supply chain.

We will continue to assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- understanding the level of awareness our team have of modern slavery risks across our business and industry;
- tracking our actions and outcomes;
- partnering with suppliers to track their impact against our modern slavery framework in our pre-qualification system;
- using Felix, evaluating suppliers for modern slavery risk and assessing their ability to manage modern slavery risk;
- assessing scopes of work for modern slavery risk prior to engaging the market;
- only using approved suppliers that have successfully passed our modern slavery onboarding assessment;
- responding to supplier modern slavery incident reporting;
- completing periodical reassessment of approved supplier modern slavery onboarding;
- undertaking internal governance and external assurance processes; and
- extending our level of influence and advocacy in seafarer networks and committees.

Based on the results of these improvements, we will adapt and strengthen our actions to improve our response to modern slavery.



Working together

As a Government Trading Enterprise, Southern Ports’ has an essential governance framework that supports the implementation of our modern slavery risk mitigation. This framework covers all levels of our business:

Southern Ports Board	Approval of Modern Slavery Statement.
Audit, Risk and Finance Committee	Oversees compliance with <i>Modern Slavery Act</i> reporting requirements.
Executive Leadership Team	Overall responsibility and decision-making in relation to modern slavery.
Projects and Procurement Governance Committee	A subcommittee of the Executive Leadership Team assists in the effective discharge of governance and oversight responsibilities relating to the delivery of major projects and procurement decisions including modern slavery risks.
Internal specialist teams – Marine, Procurement, Sustainability, Human Resources, Legal	Specialist teams across Southern Ports are responsible for day-to-day management of modern slavery risks and advocacy including actions reported on in this statement.



Reporting framework



Modern slavery reporting criteria	Location in this statement
1. Identify the reporting entity.	About Southern Ports, page 4-13
2. Describe the reporting entity's structure, operations and supply chains.	About Southern Ports, page 4-13
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.	About Modern Slavery, page 14-18
4. Describe the actions taken by the reporting entity and address these risks, including due diligence and remediation processes.	Commitment in action, page 19-23
5. Describe how the reporting entity assesses the effectiveness of these actions.	Measuring our actions, page 22
6. Describe the process of consultation with any entities the reporting entity owns or controls.	N/A
7. Any other relevant information.	

Modern Slavery Statement 2025

The content of this Modern Slavery Statement was reviewed and approved by the Board of Southern Ports on 4 December 2025. The Chief Executive Officer and Chair of Southern Ports are both decision-making members authorised to sign this statement on Southern Ports' behalf.

Strong regional ports, strong regions



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southernports.com.au

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Record No. D25/5167

