

Port of Melbourne



2025 Modern Slavery Statement



Acknowledgement of Country

PoM acknowledges the Bunurong, Wadawurrung, and Wurundjeri Peoples of the Kulin Nation as the Traditional Custodians of the land and waters on which our business operates.

We recognise and value their unique cultural heritage, customs, spiritual beliefs, and relationship with the land. We pay our respects to their Elders past, present, and emerging, and to all Aboriginal and Torres Strait Islander peoples across the communities in which we work.

Connection to Country (2022)
– Kamara Morgan

Kamara Morgan is a proud Yorta-Yorta, Gunai-Kurnai, Dja Dja Wurrung, Boonwurrung, Taungurung and Baraparapa Aboriginal artist specialising in contemporary Aboriginal art.

About the art: The piece represents the land and waters on which PoM operates. The blue circles joined by blue lines represent the role we play in facilitating trade. The oval shapes that are linked together on the water and land show the connection between Boonwurrung, Wadawurrung, and Wurundjeri people and their history, culture, and relationship to the water and land. The 'U' shapes represent people from the three countries working with PoM in managing and maintaining the port land and the waterways.



About this statement

This Modern Slavery Statement (the **Statement**) is made on behalf of the entities detailed below which are a part of the Port of Melbourne Group (referred to as **PoM, we, our or us**), and has been prepared in accordance with, and for the purposes of the *Modern Slavery Act 2018* (Cth) (the **Act**).

This Statement describes the risks of modern slavery in our operations and supply chain during the year ending 30 June 2025 (the **Reporting Period**) and details the steps that we have undertaken to respond, along with an assessment of the efficacy of these steps.

The following entities within PoM are reporting entities under the Act as they carry on business in Australia and had a consolidated revenue of over \$100 million during the Reporting Period:

- Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust;
- Lonsdale Operations Hold Pty Limited as trustee for the Lonsdale Operations Hold Trust;
- Lonsdale Asset Hold Pty Limited as trustee for the Lonsdale Asset Hold Trust;
- Lonsdale Asset Property Pty Limited as trustee for the Lonsdale Asset Property Trust; and
- Lonsdale Finance Pty Limited.

For completeness, Lonsdale Finance Hold Pty Limited, also an entity within PoM, is included in this Statement which applies to all PoM entities (together, the **Port of Melbourne Group**).

Consultation and approval

Port of Melbourne Operations Pty Ltd, as trustee for the Port of Melbourne Unit Trust, is the operating entity of PoM and provides services to the entities within PoM under management agreements. As a service provider, it is informed on all activities undertaken by PoM and employs all staff within PoM. In this Statement, a reference to the Board is to the board of the Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust.

This Statement has been prepared in consultation with, and has been approved by, the Board on behalf of each of the Reporting Entities comprising PoM on 26 November 2025 and is correct as of that date.

Disclaimer

This Statement has been prepared by Port of Melbourne Operations Pty Ltd as trustee of the Port of Melbourne Unit Trust on behalf of PoM for the purposes of the Act in relation to the Reporting Period (**Purpose**). This is a proprietary PoM document. While PoM has made reasonable efforts to ensure that information and materials provided in this Statement are free from error, PoM provides no warranty as to the accuracy, adequacy or completeness of any information provided. The information is based on information and sources which PoM believes to be reliable. Such information is intended as general information only and is intended to be current at the date of this Statement’s publication.

PoM recommends that any party seek further advice or make further enquiries which considers the relevant party’s particular circumstances before considering or acting on this material further. PoM will not be liable to any third party using or relying on any information contained in this Statement for any purpose other than the Purpose.



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Chairperson’s message

PoM has been a trade gateway for south-eastern Australia for more than 130 years. We are proud of our role as custodian of the port, which is a vital economic asset and a critical part of Victoria’s infrastructure. Our ongoing success is essential to the continued growth and prosperity of Victoria and Australia.

Through our commitment to sustainability, we work with stakeholders across PoM’s supply chain with the goal to build a sustainable port for the benefit of the Victorian economy and liveability of Melbourne. Central to this is our commitment to operate our business responsibly and ethically, and we expect that our stakeholders and suppliers will operate in the same way.

In FY25, we formalised our commitment to upholding human rights by implementing our Supplier Code of Conduct which outlines the principles and expectations that guide PoM’s relationships with its suppliers. We developed and delivered tailored procurement training for our employees who are directly involved with our suppliers. PoM will continue to deliver procurement training that incorporates modern slavery awareness to further strengthen employee understanding and support proactive supply chain risk identification, mitigation and management.

PoM proudly continued our collaboration with our long-term community partners, Stella Maris and The Mission to Seafarers, whose shared mission is to support the welfare of seafarers.

Moving forward, we are committed to continuing to strengthen our practices and engaging with our suppliers to address risks of modern slavery in our operations and supply chains.



Debbie Goodin
Chairperson of the Board of Directors



About the Port of Melbourne

As Australia’s largest general cargo and container port, the port is a vital trading gateway for south-eastern Australia, facilitating more than one-third of the nation’s container trade and enabling economic activity in the region. The port services the southeast of Australia, including Tasmania, and is central to the freight and logistics industry.

As the landlord manager of the port, we are responsible for the strategic planning, development, and management of the port under a 50-year lease from the Victorian Government.

The Port of Melbourne Group is owned by several of the largest and most experienced global infrastructure investors with expertise in managing significant infrastructure assets, including QIC, on behalf of its managed funds and clients, Future Fund, Global Infrastructure Partners (GIP) (a part of BlackRock), and OMERS Infrastructure.

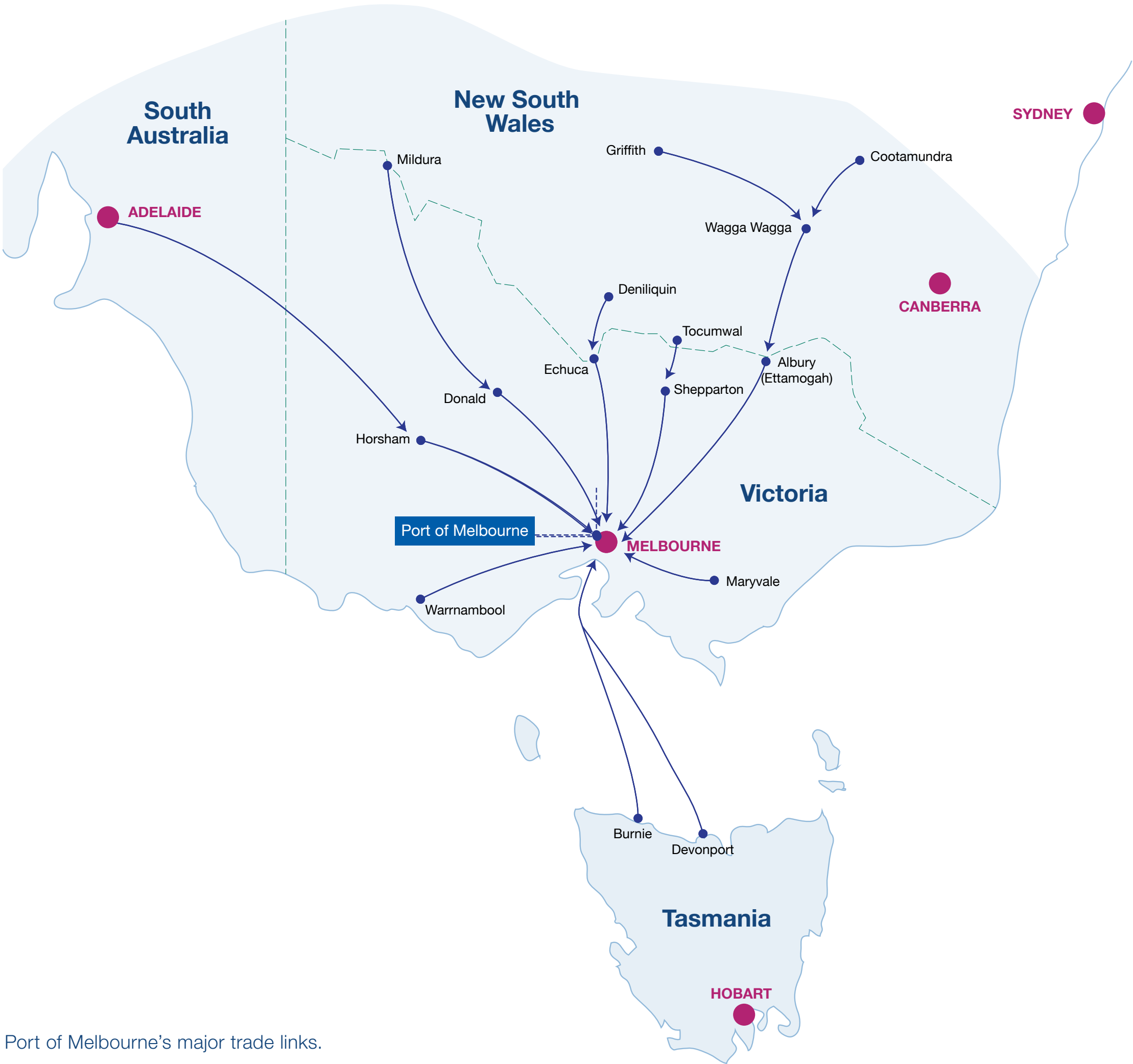
Our operations

PoM manages 534¹ hectares of port land stretching from Williamstown, around Port Phillip Bay to Port Melbourne. We also manage 52 kilometres of commercial shipping channels within Port Phillip Bay and the Yarra River.

Under the lease arrangement, PoM is responsible for maintaining and developing these land and waters, the port facilities and associated infrastructure which includes 30 commercial berths and wharves, terminal and trade-handling facilities and connections to surrounding road and rail networks. Our responsibilities also include planning for the long-term use of port land and shipping channels to ensure we have the capacity and capability to meet the future demands of Victoria’s growing economy.

The berths, wharves, terminals, and trade handling facilities are used by our 70 tenants and other private businesses who largely undertake the port’s daily operations, including the provision of cargo shipping, stevedoring, pilotage, towage and road and rail transport services.

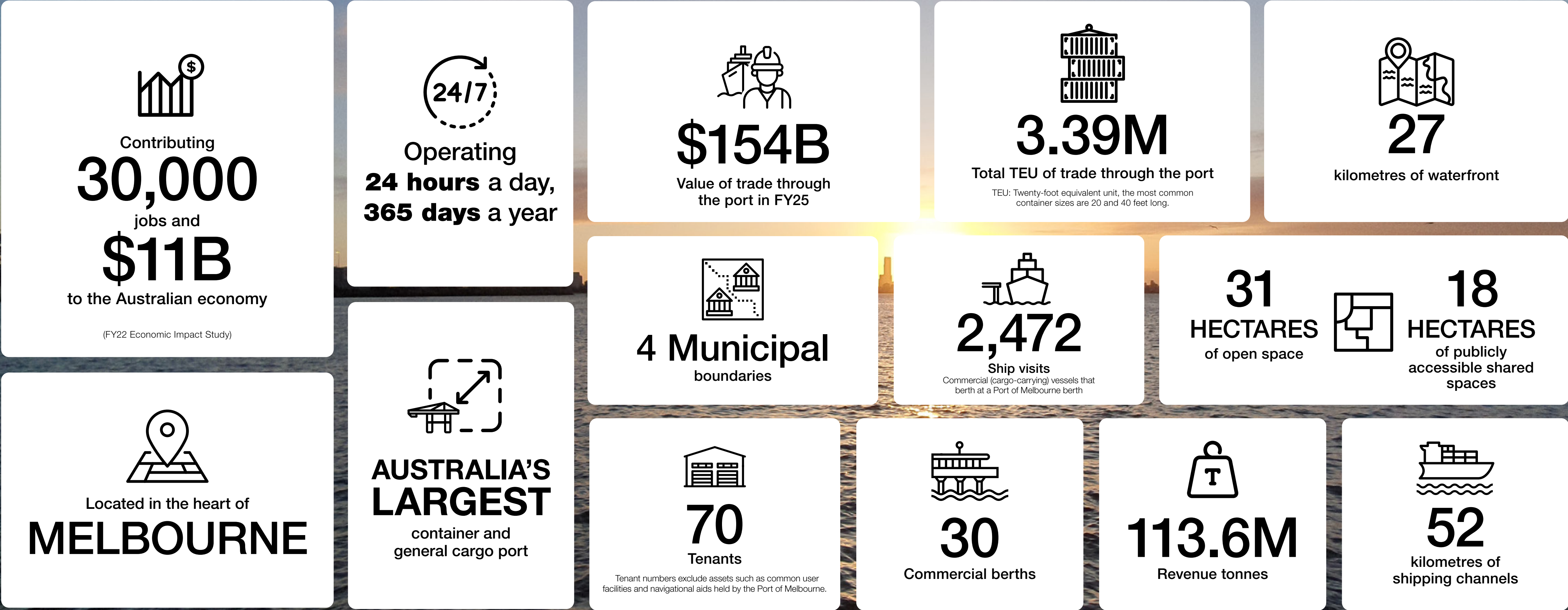
Our regulatory framework, overseen by the Essential Services Commission, enables PoM to charge tariffs for prescribed services including wharfage fees, berth hire fees and channel fees. We also charge tenants to lease space and facilities in the port precinct.



Port of Melbourne's major trade links.

¹ with the inclusion of approximately 29 hectares of the former Melbourne Wholesale Market site, for which PoM signed a lease in FY25 and expects to access in 2026.

FY25 operational statistics



Our purpose statement

Our purpose statement

Connecting Australia to the World

PoM is a crucial link in Australia’s economy and society by efficiently moving goods, supporting jobs, and connecting communities with the products they need. Our commitment to resilient, future-ready operations underpins economic growth and the everyday lives of Australians. In an ever-evolving global landscape, PoM remains dedicated to **Connecting Australia to the World**.

Our vision, mission and values

Our vision

Our passion for growing trade creates an enduring city port, driving the economy and enriching lives.

Our mission

Working together with customers and the community, delivering innovative and sustainable port solutions – creating the future and building on our proud history.

Our values

Our values are a shared understanding of what we stand for as an organisation. They describe the things we strive for – with our customers, the community and each other.

Integrity

We build trust by acting with honesty and transparency

Collaboration

We achieve more by engaging and working together

Accountability

We fulfil our commitments, take responsibility for our actions, and celebrate success

Adding value

We embrace excellence, and innovation in what we do and how we do it



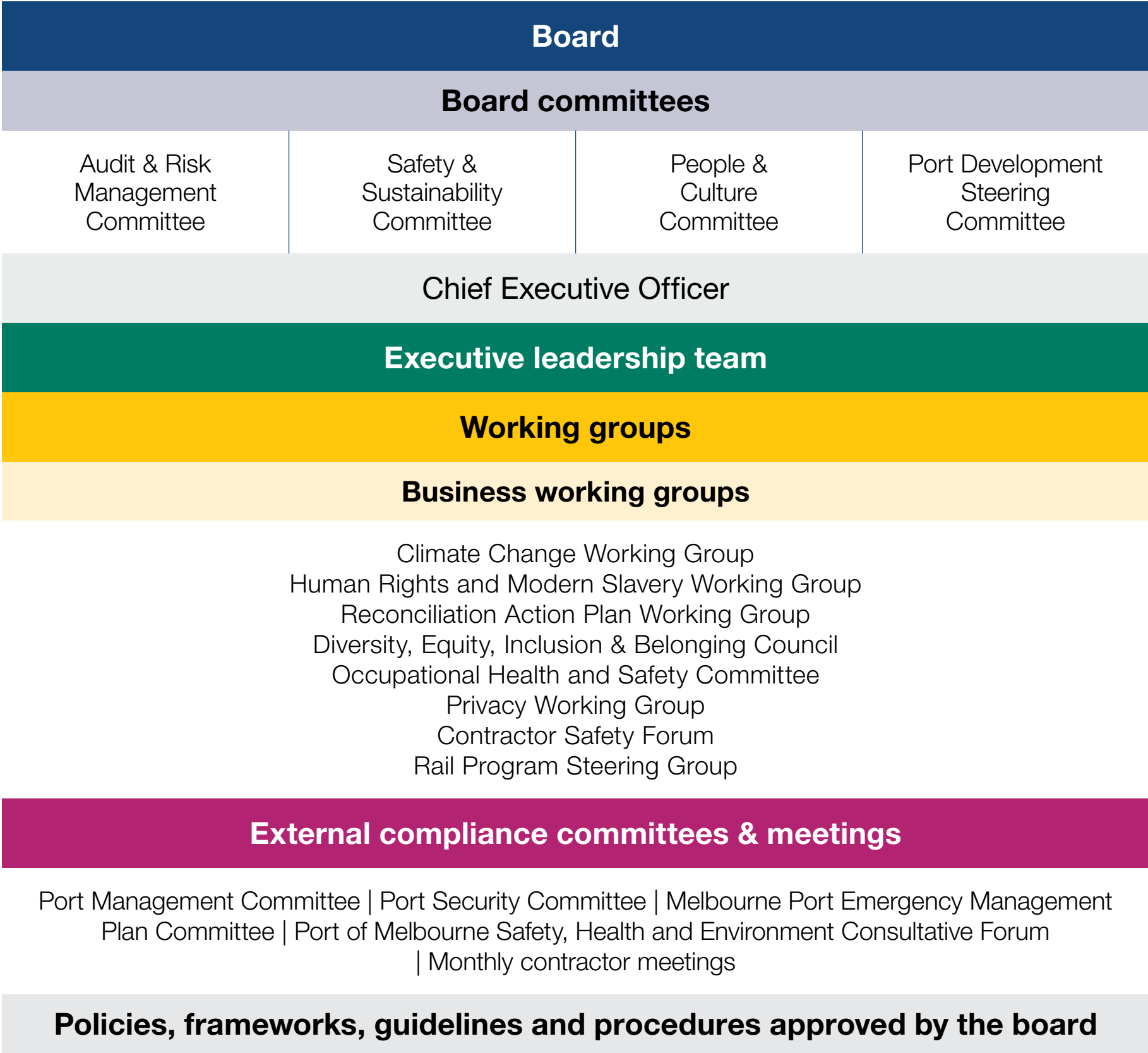
Corporate governance

PoM is committed to maintaining strong corporate governance practices to help us meet our legislative requirements and corporate governance standards.

Our Human Rights and Modern Slavery Working Group (**Working Group**) includes executive level leadership, together with representatives from Legal Services, People and Culture, Sustainability, Finance, Operations, and Corporate Relations. The Working Group supports PoM’s modern slavery risk management by facilitating employee training, engaging with suppliers, and supporting community partners.

The management of human rights and modern slavery risk are embedded within PoM’s overall governance structure and supported by a range of policies, codes and guidelines.

PoM governance structure



Human rights and modern slavery governance

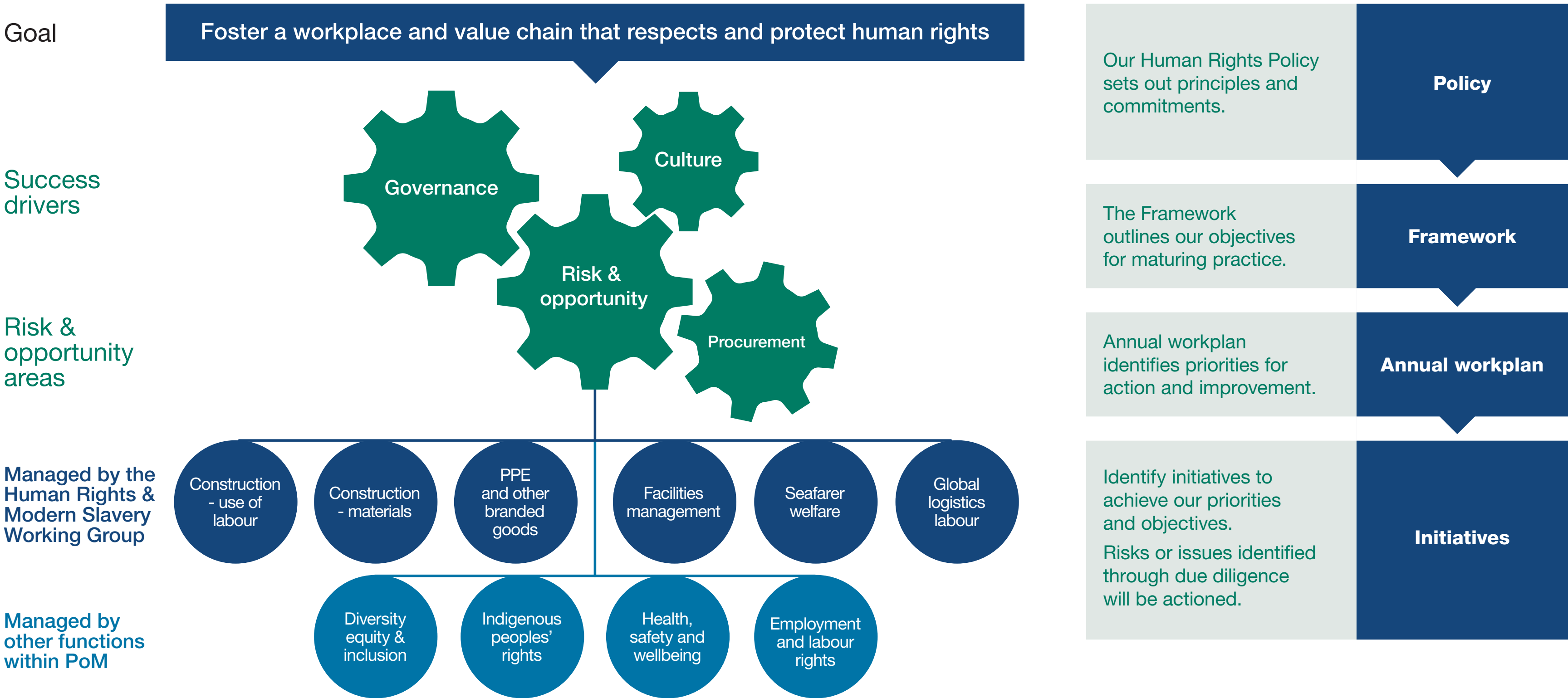


Corporate governance

Human Rights and Modern Slavery Framework

PoM continues to be guided by our internal Human Rights and Modern Slavery Framework (the **Framework**) which underpins our approach to managing and mitigating human rights and modern slavery risks.

The Framework incorporates PoM’s understanding of its key risks, sets out roles and responsibilities, and provides an action roadmap. It outlines our goal to foster a workplace that respects and protects human rights, and encourages continuous improvement in our approach to managing human rights.



Our policies, codes and guidelines

Our policies are reviewed biennially and approved by our Board. The following policies support the management of modern slavery risks in our workforce and supply chain.

Human Rights Policy

Our internal Human Rights Policy is informed by the United Nations Guiding Principles on Business and Human Rights. It outlines principles for respecting and protecting human rights in our operations and supply chain. This policy describes how we will apply these principles through our broader policy framework, sets out procedures for those reporting policy breaches.

Supplier Code of Conduct

Our Supplier Code of Conduct outlines principles and expectations that guide our relationships with our suppliers, including regarding governance, business integrity, labour and human rights, environmental management, health, safety and wellbeing, stakeholder and community engagement, privacy, data protection and cybersecurity. PoM seeks to partner with organisations that align with our objective to reduce potential modern slavery instances in our supply chain.

Code of Conduct Policy

Our Code of Conduct Policy governs our employees’ and contractors’ conduct by establishing a clear, expected behavioural standard and fostering a positive work environment where everyone’s rights are maintained. The Code is supported by a suite of policies, frameworks, and guidelines, including the Appropriate Workplace Behaviour Guideline, which reflects PoM’s commitment to governance,

anti-corruption, ethical conduct, equal opportunities, workplace health and safety, and privacy. It also outlines the formal support available to assist employees with any concerns or grievances.

Whistleblower Policy

Our Whistleblower Policy provides a framework to respond to reports of actual, or suspected misconduct, including instances of modern slavery. It outlines legal protections for whistleblowers and procedures for receiving, handling, and investigating such reports, including PoM’s independent external service for eligible persons to make anonymous reports. The policy applies to all persons including, but not limited to, directors, employees, contractors, suppliers, and their family members. It provides an anonymous hotline for our internal and external stakeholders.

Sustainability Policy

Our Sustainability Policy outlines our sustainability objectives and principles that guide the way PoM plans, operates, and makes business decisions that take into consideration economic, environmental, social and governance outcomes. These principles include maintaining a safe, diverse, equitable and inclusive workplace, respecting and supporting the communities in which we operate, while managing sustainability risks and opportunities.

Diversity, Equity, Inclusion and Belonging Policy

Our Diversity, Equity, Inclusion and Belonging Policy sets out our commitment to a workplace that is diverse and inclusive, and reflective of the population. It defines diversity and inclusion at PoM and identifies the behaviours we expect of our employees in a diverse and inclusive workplace.

Health, Safety and Wellbeing Policy

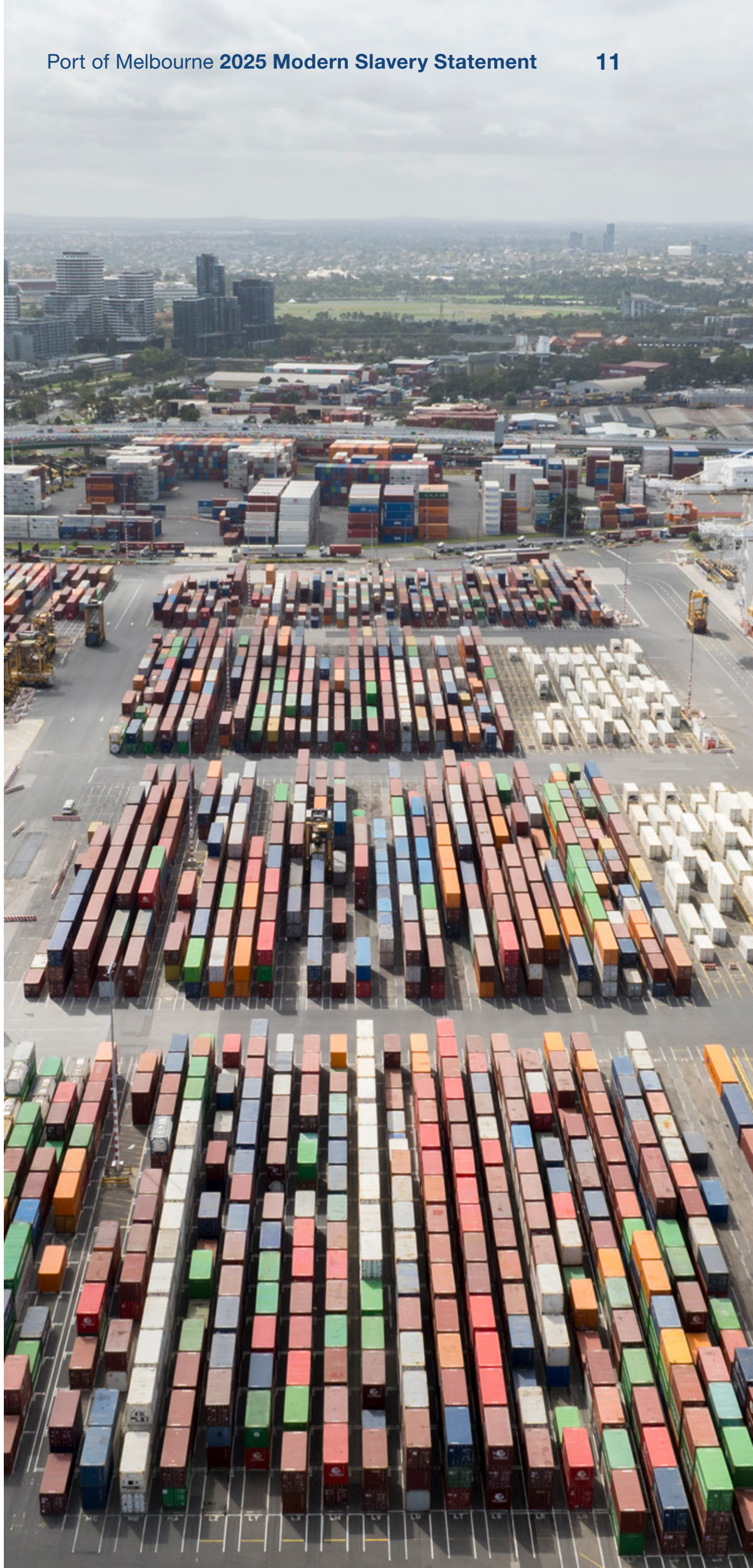
Our Health, Safety and Wellbeing Policy outlines our commitment to a safe and healthy environment for all employees, contractors, and visitors. It provides an overview of our objectives relating to maintenance of our health and safety management systems, legislative compliance, work-related injury and illness measurements and targets, health and safety workforce engagement, and stakeholder relationship building to improve outcomes.

Procurement and Contract Management Policy and Guidelines

Our Procurement and Contract Management Policy and Guidelines outline the principles that guide our procurement activities. The policy reflects the value, risk, and complexity of our engagements and balances achieving commercial value with probity and efficiency. It sets out our commitment to conducting appropriate due diligence and engaging suppliers aligned with our sustainability, health and safety, cybersecurity and modern slavery principles.

Enterprise Risk Management Framework

Our Enterprise Risk Management Framework identifies our risk appetite, risk management processes, responsibilities from our Board to employees, reporting requirements and our strategic risk approach.



Our workforce

Our workforce consists of diverse and skilled professionals with knowledge and experience in strategy, operations, engineering, property, finance, human resources, legal, and corporate relations roles.

All our employees are engaged in Australia under local employment laws. Recruitment is managed by our internal People and Culture team, with recruitment of select roles supported by external recruiters. Onboarding is administered by the responsible department in accordance with our Code of Conduct policy.

As of 30 June 2025, PoM employed 159 people. Our employees are based in our corporate office, adjacent to the port in Melbourne’s Docklands, except for one employee based in Wagga Wagga in the Riverina region of New South Wales.

FY25 Workforce profile*

	FY25
Total employees	159
Permanent contract	153
Fixed term contract	5
Casual	1
Contingent workers**	27

*As at 30 June 2025

**PoM defines contingent workers as temporary workers with a limited tenure that are engaged to do work controlled by PoM and are employed as independent contractors, freelancers, or employees of PoM’s suppliers. PoM’s contingent workers are provided with a workspace and/or tools and complete mandatory compliance training modules including Appropriate Workplace Behaviour training. All contingent workers are employed in Australia.



Our supply chain

In FY25, PoM spent \$215 million on goods and services from more than 416 suppliers, across several supplier categories and locations or origin.

Supplier location

Modern slavery transcends national boundaries and affects every country, irrespective of economic status. According to the latest Global Estimates of Modern Slavery, more than 50 million people are currently living in situations of modern slavery.²

Over 98.8% of our spend by value and 96.2% of our suppliers in FY25 were based in Australia, which has a comparatively low risk of instances of modern slavery. This is attributed to Australia's government response to modern slavery, which ranks as the strongest in the Asia-Pacific region and the second highest globally, contributing to the nation's minimal vulnerability.³ The remaining 3.8% of our suppliers were based in Asia-Pacific, Europe and North America.



Supplier industry

PoM's supply chain is made up of a diverse range of industry sectors and services of which each undertake different activities and have different risk profiles.

Industry	FY25	
	\$ spend	%*
Construction work: this includes suppliers who develop, construct, and remediate PoM's infrastructure assets such as wharves, roads, rail, and civil works as part of our capital projects.	\$125.7M	58.4%
Corporate business services: a range of businesses provide PoM with services including consultancy, IT, accounting, tax, audit, market research, cleaning, and waste services.	\$38.0M	17.7%
Utilities, infrastructure levies and public administration: PoM works with public authorities and other infrastructure managers to deliver port operations including services provided by rail, electricity, and water utilities.	\$20.8M	9.7%
Asset maintenance services: this includes suppliers that perform infrastructure operations, maintenance and remediation services including specialists in marine, electrical, real estate, civil infrastructure, and port security.	\$18.7M	8.7%
Computer and software: PoM uses a range of technical and general corporate IT and computer software.	\$6.6M	3.1%
Construction materials: this includes the procurement of materials and parts for our infrastructure assets.	\$4.8M	2.2%
Other products and services: this includes a range of other goods and services. Most notably from a modern slavery perspective, it includes spend on Personal Protective Equipment (PPE), safety equipment and branded corporate goods.	\$0.8M	0.4%
Grand Total	\$215M	100%

*Note: any discrepancies are due to rounding

² Walk Free. 2025, May 30. Global Slavery Index. <https://www.walkfree.org/global-slavery-index/findings/global-findings/>
³ Walk Free. 2025, May 30. Global Slavery Index. <https://www.walkfree.org/global-slavery-index/country-studies/australia/>



Identifying modern slavery risks

Summary: Our priority risk areas and actions

PoM has identified the following risk areas and developed a risk register to monitor and respond to each risk. These areas are more likely to be impacted by human rights and modern slavery issues than other areas of PoM’s supply chain.

Potential risk	Risk description	Mitigating actions used where appropriate
<div>Construction labour</div> <div></div>	<p>PoM engages construction companies to undertake infrastructure development and upgrade works at the port.</p> <p>Construction companies often work with complex supply chains that may include unreasonable labour hire arrangements. Potential labour exploitation issues in Australia include substandard working conditions (such as poor health and safety practices), unfair long hours and unfair pay. In addition, although less common, cases of human trafficking, debt bondage, withholding of passports and threatened violence have been recorded in the industry.⁴</p>	<ul style="list-style-type: none">• Procurement and Contractor Management• Policy and Procurement and Contract Management Guidelines• Supplier Code of Conduct• Modern slavery clauses in contracts with suppliers• Integrated Safety Management System• Contractor Safety Subordinate Risk Register• Contractor Safety and Environment Management Procedure• Regular construction site inspections• Tender processes that include questions about management of modern slavery risk and sub-contracting policies
<div>Construction materials</div> <div></div>	<p>PoM procures construction materials, including cement, steel, and fabricated metal products, to undertake infrastructure development and upgrade works in the port. Materials and large equipment are often sourced from international manufacturers in high-risk industries and/or geographies with limited working condition controls.</p>	<ul style="list-style-type: none">• Procurement and Contractor Management Policy and Procurement and Contract Management Guidelines• Supplier Code of Conduct• Tender processes that include questions about management of modern slavery risk and sub-contracting policies
<div>Facilities management services</div> <div></div>	<p>PoM procures facilities management services, including security, cleaning, and waste services.</p> <p>These services are at higher risk of modern slavery occurring due to a high level of subcontracting and reduced oversight of employee working conditions. These industries also employ more people from vulnerable populations such as people who are unskilled workers, migrants, culturally and linguistically diverse, or from low socioeconomic backgrounds.</p>	<ul style="list-style-type: none">• Procurement and Contractor Management Policy and Procurement and Contract Management Guidelines• Supplier Code of Conduct• Modern slavery clauses in contracts with suppliers• Tender processes that include questions about management of modern slavery risk and sub-contracting policies
<div>PPE and other corporate goods</div> <div></div>	<p>PoM procures PPE and other corporate goods such as office furniture and branded merchandise.</p> <p>These products may be mass produced at low cost, procured from high-risk countries, or made by workers from vulnerable backgrounds.</p>	<ul style="list-style-type: none">• Procurement and Contractor Management Policy and Procurement and Contract Management Guidelines• Supplier Code of Conduct• Engagement with direct suppliers about their approach to managing modern slavery risks
<div>Seafarer welfare</div> <div></div>	<p>We acknowledge that there is inherent modern slavery risks related to the shipping, cargo handling, and logistics industry. While these operations are outside of our reporting obligations under the Act, we recognise the importance of this issue for PoM.</p> <p>Seafarers are vulnerable to human rights and modern slavery risks due to complex employment arrangements that can include separate crew agents, ship operating companies and vessel managers. Regulation and oversight of seafarer welfare is fragmented due to the industry’s global nature. Exploitation can include bullying and harassment, refusal of shore leave, untreated injuries, no access to fresh food, withholding of wages, withholding of identification documents and unpaid overtime.⁵</p>	<ul style="list-style-type: none">• Ongoing partnership with, and financial support of, two charity organisations who support the welfare of seafarers visiting the port

⁴ Australian Institute of Criminology, 2017, Labour exploitation in the Australian construction industry: risks and protections for temporary migrant workers and Australian Human Rights Commission and KPMG, 2020, Property construction and modern slavery.

⁵ Global Compact Network Australia and the Maritime Union of Australia, 2022, Modern Slavery within the Maritime Shipping Supply Chains.

Identifying modern slavery risks

Our operational and supply chain risks

Modern slavery may be difficult to detect and often goes unnoticed. Operational risks may arise within our supply chain due to the complexity and multi-tiered nature of our supplier network, as well as limited visibility into lower-tier operations.

Operational risks

Given the employment arrangements for PoM’s workforce under the *Fair Work Act 2009* (Cth), our governance and policy framework, and employee training, we have assessed that the residual risk of exploitation of our employees is low.

Despite this low risk, we think that it is important to ensure that our employees are well-informed about human rights and modern slavery related risks by:

- providing company-wide modern slavery information sessions;
- providing modern slavery training and awareness for new employees;
- publishing our publicly available annual modern slavery statement; and
- ensuring all our employees have access to our governance policies and guidelines.

Supply chain risks

Due to the complexity and international scope of PoM’s supply chain, maintaining a thorough awareness of modern slavery risks within our supply chain continues to be a key focus. In FY25, we reviewed our priority areas of supply chain risks, these are strongly influenced by the suppliers with which we have significant spend, and those who

have a higher inherent risk profile due to their industry type. Priority supply chain risks were identified across the following areas of our industry and remain consistent with our previous annual modern slavery statement. We had significant spend in the following areas of our supply chain.

By spend:

- construction services for infrastructure development;
- corporate business services; and
- utilities, infrastructure levies and public administration.

By category:

- PPE and other corporate goods; and
- facilities management services, including security, cleaning, and waste services.

Supplier risk assessment methodology

To identify these overall risks, PoM uses Fair Supply’s risk assessment tool to screen suppliers for potential modern slavery risk. Fair Supply’s model uses proprietary technology to link global trade flow data with PoM’s supplier spend figures. This is done using multi-regional input-output data that captures the geographic location and industry of products and services in the extended supply chain.

This analysis enabled PoM to identify the categories, geographic regions, and tiers within our supply chain where the potential risk of modern slavery exposure is the highest so that we can be more targeted in our engagement with our supply chain. The model produces an initial risk rating for our suppliers from tier one to tier ten.

Suppliers identified as having higher inherent risk based on spend volume, country of origin, industry and products or service type are asked to complete a Supplier Self-Assessment Questionnaires. Fair Supply uses their responses to refine the initial risk ratings.



Identifying modern slavery risks

Our risk profile

PoM’s overall risk profile currently rates the majority of PoM’s suppliers as either low or moderate-low.

Risk profile	Proportion of suppliers	Proportion of spend	Relevant products or services
Low	90.9%	98.4%	Construction services Corporate business services Port-related public administration services Stationery and office furniture Computer related services
Moderate-low	9.1%	1.6%	Construction materials Corporate business services Corporate branded goods Office catering PPE and safety equipment
Moderate-high	0%	0%	Not applicable
High	0%	0%	Not applicable

Understanding our risk rating

Fair Supply’s baseline risk data is expressed in terms of the theoretical number of forced labourers in PoM’s supply chain per million dollars of procurement spend. This is then presented on a spectrum from low to high that ranks each supplier relative to all other industry/country combinations.

Risk rating	Risk categories represent the distribution of companies across industries and countries combinations within the overall risk assessment matrix.				
	Low	Moderate-Low	Moderate	Moderate-High	High
Definition	lowest 7.0%	lowest 20.3%	lowest 29.0%	highest 27.9%	highest 15.9%

Potential modern slavery risk exposure in our extended supply chain

Fair Supply’s modelling identifies the complexity and distribution of potential modern slavery risks across our supply chain from tier one (being PoM’s direct suppliers) to tier ten. It showed:

- across ten tiers of our supply chain, 98.4% of potential modern slavery risk exposures are in Australia.
- 69% of possible modern slavery risk related to construction work and materials; and
- the remaining potential risk exposure included corporate business services, computer and related services and port-related public administration services sourced from suppliers based in North America, Europe, and Asia-Pacific.

Grievance mechanisms

PoM has grievance mechanisms in place to address modern slavery concerns and provide internal and external avenues to report unethical behaviour or policy breaches. Internal concerns can be reported in accordance with our internal processes and governance policies which are accessible to all our employees and contingent workers.

External reporting is managed and monitored by an independent third-party service provider to ensure impartiality and confidentiality.

In FY25, no whistleblower reports were made, and therefore, there are none under investigation. Our Whistleblower Policy is accessible on our public website [here](#).



Implementation of FY25 actions

In FY25, PoM put in place steps to advance our modern slavery due diligence, support our community partners, monitor our risks and implement our Supplier Code of Conduct. The actions we undertook were aligned to our forward focus areas identified in our previous Modern Slavery Statement and are outlined below.

Governance and Policy

Developing a PoM risk register

PoM developed a modern slavery risk register which is designed to support informed decision-making and due diligence. The register provides a structured approach to identify, assess, and document potential modern slavery risks across our operations and supply chain.

The risks identified throughout FY25 will be monitored and managed in accordance with PoM's Enterprise Risk Management Framework to ensure appropriate escalation and oversight of PoM's modern slavery risks.

Effectiveness of Action: PoM completed the action of developing a Modern Slavery Risk Register. This has supported us with the ongoing monitoring and response to modern slavery risk.



Reviewing the reporting process

PoM undertook a high-level review of our modern slavery reporting processes to assess its effectiveness. The review confirmed that PoM has clear internal and external channels in place for reporting, including third-party mechanisms, with defined roles and accountabilities appointed to key personnel within the senior leadership group. In FY26, PoM will build on this high-level review by developing a corrective action plan to formalise our incident response procedures with our suppliers and contractors.

Effectiveness of Action: The completion of this review confirmed that sufficient reporting mechanisms are in place for responding to reported incidents of modern slavery and that key personnel understand their roles and the processes for escalation. This action also helped to uncover an opportunity for improvement in our procedures relating to how we will work with our suppliers and contractors should a modern slavery issue arise. This will be addressed as part of our FY26 actions.



Supply Chain Practices

Implementing the Supplier Code of Conduct

Where possible, PoM endeavours to partner with organisations aligned with our objective to reduce instances of modern slavery in our supply chain. Our Supplier Code of Conduct outlines the principles and expectations that guide our relationships with suppliers.

All existing suppliers were provided with our Supplier Code of Conduct. While adherence is not currently mandatory, the Supplier Code of Conduct forms a key part of our supplier engagement process.

Effectiveness of Action: In FY25, all existing suppliers and all new suppliers received a copy of the Supplier Code of Conduct to ensure they are aware of PoM's standards and expectations. This has supported us to be more effective in setting expectations and driving better supplier practices.



Reviewing the Procurement and Contract Management Guidelines

In FY25, PoM undertook the review of our Procurement and Contract Management Guidelines, which embeds human rights and modern slavery awareness into our practices and strengthen our commitment to identifying and mitigating potential risks across our supply chain.

Effectiveness of Action: PoM completed the action to review the Procurement and Contract Management Guidelines. This has supported us to be more effective in monitoring and responding to issues with our suppliers.



Operational practices

Tailored training – procurement processes

PoM commenced targeted procurement awareness sessions for key business divisions which provided an update on the changes to our procurement guidelines and practices. These sessions highlighted the importance of the Supplier Code of Conduct and the responsibilities of employees managing suppliers. In FY26, PoM will continue to deliver procurement training, incorporating modern slavery awareness, to strengthen the awareness and support employees in managing supply chain risks.

Effectiveness of Action: PoM has commenced targeted procurement awareness sessions for Finance and Operations, the two key divisions that are directly involved with our suppliers, contractors and overall procurement processes. This has supported us to be more effective in understanding and managing modern slavery risks.



Implementation of FY25 actions

Collaboration with stakeholders

PoM’s strategic partnerships with tenants, port users, industry associations, government, and community play a key role in our ability to influence modern slavery practices beyond our own direct stakeholders and supply chain.

Community partnerships through our Port Education Centre

PoM provides a port education program to primary and secondary schools which explore the port’s operations, maritime engineering and how goods are transported around the world. The Victorian Certificate of Education (VCE) Program, which is a core PoM Port Education offering, includes content about human rights and modern slavery in the maritime industry.

Effectiveness of Action: In FY25, PoM delivered the VCE program to 871 students from 17 different Victorian schools. Our education programs are intended to support other stakeholders to understand modern slavery risk and be more effective in addressing it within their own organisations and areas of influence.



Collaboration on Seafarer initiatives

For over a decade, PoM has partnered with Stella Maris and The Mission to Seafarers, the two seafarer welfare charities in Victoria (**community partners**). PoM provides annual financial support to both charities and 100% of the proceeds from our community boat tours.




These organisations provide a range of services to seafarers calling at the port. These services have a strong focus on supporting seafarers’ needs while in port such as money remittance, counselling (both onboard and ashore), live streaming of mass, assisting with hospital visits, bus trips (pickups and drop-off from port to the charity centres), and free Wi-Fi. They also provide safe and anonymous support and reporting services to seafarers who have concerns for seafarer safety, human rights and modern slavery matters.

In FY25, PoM began collecting data from these community partners to better understand the services offered and support provided to seafarers.

Effectiveness of Action: In FY25, over 18,000 seafarers representing at least 79 countries benefited from seafarers’ welfare organisations supported by PoM, including support in the event of seafarer safety, human rights or modern slavery issues. Continuing to monitor this data will provide PoM with visibility as to whether our community partners are observing any areas of concern, or reports of modern slavery.



In FY26, PoM will continue to work with these community partners to identify collaborative opportunities to further support seafarers.

Outcome	Services/Admin Support
	Over 18,000 Seafarers visited the charity centres
	79+ Seafarers’ nationalities
	Over 3,200 SIM Card activation and connection

Top 5 Seafarers’ Nationalities	
	42% Philippines
	17% China
	15% India
	4% Myanmar
	4% Ukraine



Our forward focus

PoM is committed to identifying, mitigating, and reducing modern slavery risks from our operations and supply chains. In FY26, we will continue to build upon our efforts by undertaking the following actions:





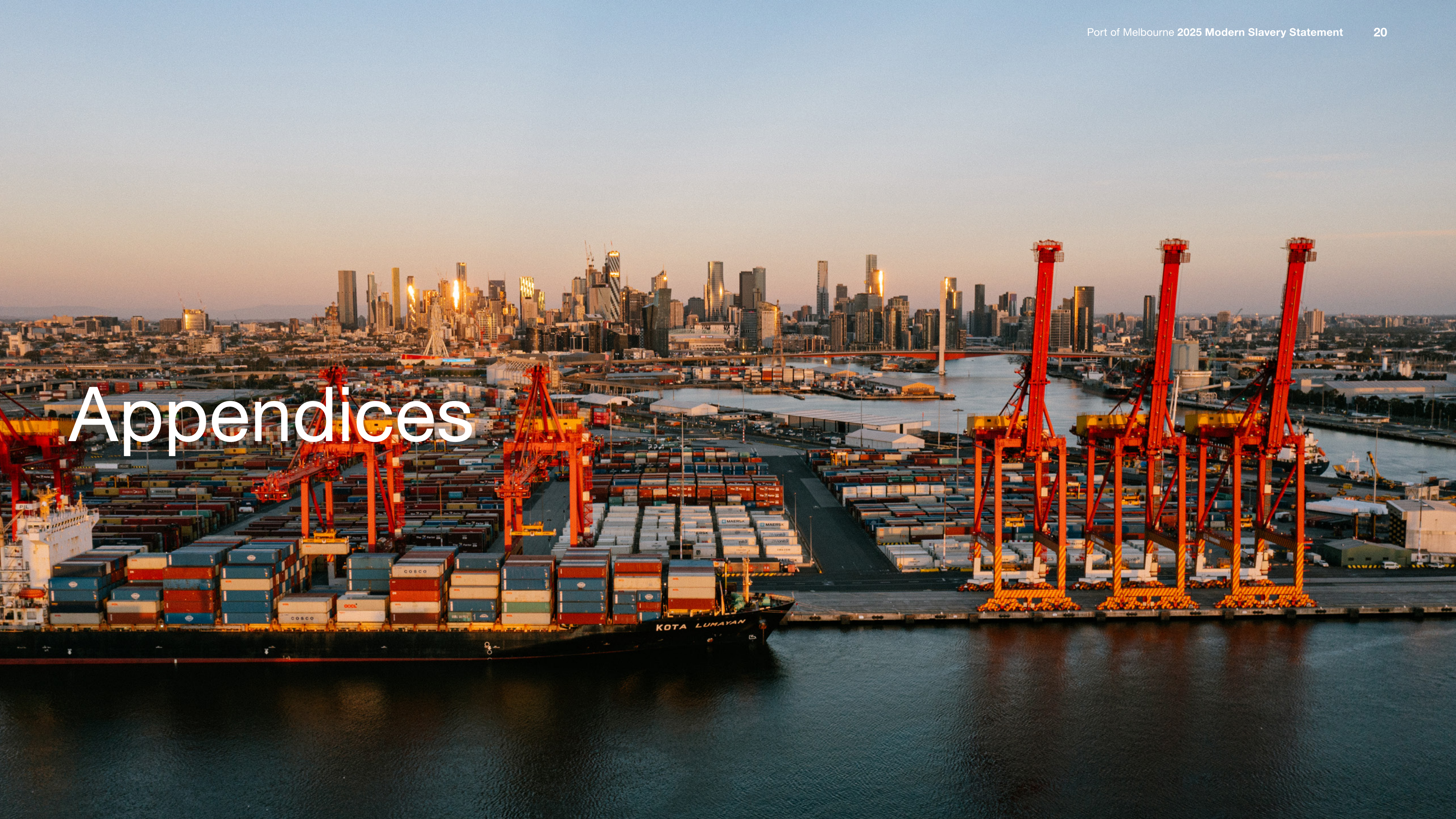
Action Area		FY26 Focus areas
Governance and policy		<ul style="list-style-type: none">• Annual benchmarking of our modern slavery statement progress against peers and best practice frameworks.
		<ul style="list-style-type: none">• Develop a corrective action plan to form part of PoM’s formalised incident response procedure.
		<ul style="list-style-type: none">• Monitor and manage the modern slavery risk register in accordance with our Enterprise Risk Management Framework to strengthen our existing due diligence processes.
Supply chain practices		<ul style="list-style-type: none">• Enhance our supplier risk assessments process, including issuing third-party due diligence questionnaires.
		<ul style="list-style-type: none">• Conduct procurement training with a focus on human rights and modern slavery for all procurement and contract managing employees who engage with suppliers.
Operational practices		<ul style="list-style-type: none">• Conduct modern slavery training and awareness sessions for all employees through internal platforms.
Collaboration with stakeholders		<ul style="list-style-type: none">• Collect biannual data from seafarers’ welfare community partners to monitor whether any areas of concern have been identified or reports of modern slavery have been received, as well as to assess how we might better support them through our collaboration.

Photo: Andrew Ternes, Senior Hydrographic Surveyor



Appendices

Appendix One: Mandatory reporting criteria

Modern Slavery Act 2018 (Cth) criteria		Reference in this Statement	Page
1	Identify the reporting entity and any entities the reporting entity owns or controls.	About this Statement	Page 3
2	Describe the reporting entity’s structure, operations, and supply chains.	About PoM	Page 6
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	Identifying modern slavery risks	Page 15
4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Implementation of FY25 actions	Page 17
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Implementation of FY25 actions	Page 17
6	Describe the process of consultation with any entities the reporting entity owns or controls.	Consultation and approval	Page 3
7	Other relevant information.	Our forward focus	Page 19



Port of Melbourne



Contact us

Port of Melbourne welcomes feedback and questions about this report and our sustainability program.

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