PORT AUTHORITY
OF NEW SOUTH WALES

Port Authority of New South Wales
Modern Slavery Statement

Reporting Period: FY26

Head Office: Level 4, 20 Windmill Street, Sydney NSW 2000

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1 Introduction

Port Authority of New South Wales (ABN 50 825 884 846) (**Port Authority**) is a reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth) and is therefore required to prepare and publish an annual 'Modern Slavery Statement' (**Statement**) describing its actions to assess and address modern slavery risks in its operations and supply chains.

In accordance with section 16 of the *Modern Slavery Act 2018* (Cth), this Statement is issued for the reporting period of FY26.

How this Statement addresses the mandatory reporting criteria

Mandatory reporting criterion	Where addressed in this Statement
Identifies the reporting entity	Section 1 — Introduction
Describes the structure, operations and supply chains of the reporting entity	Section 2 — Structure, Operations and Supply Chains
Describes the risks of modern slavery practices in the operations and supply chains of the reporting entity	Section 3 — Modern Slavery Risks
Describes the actions taken to assess and address those risks, including due diligence and remediation processes	Section 4 — Actions Taken to Address Modern Slavery Risks
Describes how the effectiveness of those actions is assessed	Section 5 — Assessment of the Effectiveness of Actions
Describes the consultation process with any entities owned or controlled by the reporting entity, or explains why this criterion does not apply.	Section 6 — Consultation with Controlled Entities
Includes any other relevant information	Section 7 — Future Actions and Maturity Roadmap

The term 'modern slavery' is defined in section 4 of the *Modern Slavery Act 2018* (Cth), and is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Port Authority recognises that managing modern slavery risk is an ongoing process. During FY26, Port Authority continued to mature its procurement controls, supplier due diligence, supply chain transparency, contract management practices and governance arrangements, while embedding continuous improvement practices aligned with NSW Government expectations and guidance issued by the NSW Anti-Slavery Commissioner.

2 Structure, Operations and Supply Chains

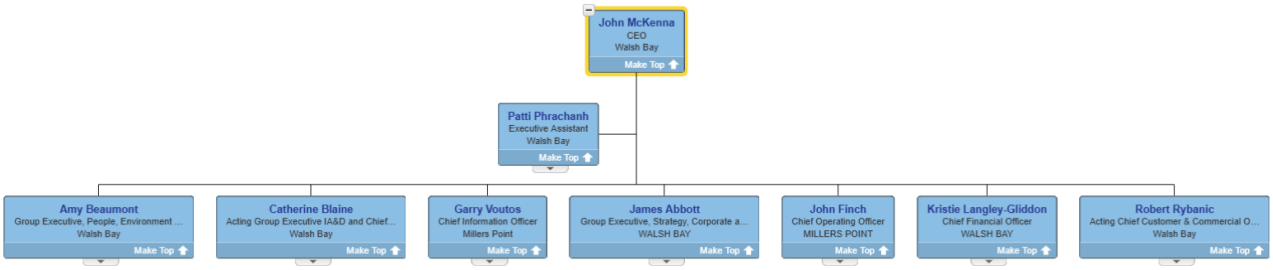
2.1 Structure

Port Authority is a State owned corporation constituted by section 6 of the *Ports and Maritime Administration Act 1995* (NSW) (**PAMA Act**) and operates in accordance with that Act and the *State Owned Corporations Act 1989* (NSW) (**SOC Act**) and associated regulations.

At the time of this report, Port Authority's Board comprises of Chair, Justine Jarvinen, Dr Deborah Dearing, Kay Salvair Smith, Kristine Neill, Tom Laidlaw and Wayne Stokes. Port Authority employs approximately 388 people.

Port Authority's Executive team is set out in Figure 1, Organisational Chart.

Figure 1: Organisational Chart



Port Authority's principal objectives, which are derived from the SOC Act are:

1. to be a successful business and, to this end:
    a. to operate at least as efficiently as any comparable businesses; and
    b. to maximise the net worth of the State's investment in the State owned corporation;
2. to exhibit a sense of social responsibility by having regard to the interests of the community in which Port Authority operates;
3. where Port Authority's activities affect the environment, to conduct its operations in accordance with the principles of ecologically sustainable development contained in section 6(2) of the *Protection of the Environment Administration Act 1991* (NSW); and
4. to exhibit a sense of responsibility towards regional development and decentralisation in the way in which Port Authority operates.

The SOC Act states that each of the above principal objectives is of equal importance.

In addition to the above, Port Authority's principal objectives set out in the PAMA Act, are:

1. to promote and facilitate trade through its port facilities;
2. to ensure that its port safety functions are carried out properly;
3. to promote and facilitate a competitive commercial environment in port operations; and
4. to improve productivity and efficiency in its ports and the port-related supply chain.

2.2 Operations

Port Authority manages the navigation, security and operational safety needs of commercial shipping in the ports of Sydney (Port Jackson and Botany Bay), Port Kembla and the ports of Newcastle, Eden and Yamba in the State of New South Wales (**NSW**).

Its principal functions are set out in section 10 of the PAMA Act, being to:

1. establish, manage and operate port facilities and services in its ports
2. exercise the port safety functions for which it is licensed in accordance with its operating licence, and
3. facilitate and co-ordinate improvements in the efficiency of the port-related supply chain.

Port Authority's business is underpinned by the property assets which owns, controls or operates and by the management and control of shipping in accordance with the *Marine Safety Act 1998 (NSW)*, PAMA Act and its Port Safety Operating Licence (**PSOL**) issued to it by the NSW Minister for Transport under section 12(2) of the PAMA Act. The PSOL establishes the functions and standards to which Port Authority must meet to ensure navigational safety for international and interstate trading vessels in the ports and an appropriate

response to marine emergencies. In fulfilling its functions and obligations, Port Authority's main undertakings are:

Logistics and Trade

- Promotion and facilitation of a competitive commercial environment in port operations;
- Trade facilitation;
- Support and facilitation of the passenger cruise industry;
- Facilitation and coordination of improvements in the efficiency of the port-related supply chain for the Hunter Coal Export Framework (HCEF); and
- Port promotion and marketing.

Navigation

- Shipping channels and navigation aids;
- Port communications and harbour control;
- Vessel traffic management;
- Emergency response;
- Security patrols; and
- Harbour Master.

Berth Services

- Common-user wharves;
- Passenger terminals; and
- Monitoring of port security.

Shipping

- Vessel arrival system and berth allocations;
- Advice on berthing requirements, i.e. pilots, tugs, lines, handling;
- Administering dangerous goods in port areas; and
- Port operational/e-commerce systems.

Pilotage

- Pilotage of vessels.

Port Assets

- Port estate management and property maintenance;
- Sites for cargo handling;
- Development planning; and
- Implementation of its Maritime Security Plans, in accordance with the Maritime Transport & Offshore Facilities Security Act 2003 (Cth).

Port Safety and Environment

- Safe transfer of bulk liquids and dangerous goods;

- Emergency response to and subsequent investigations into marine accidents and incidents; and
- Emergency environmental protection services for marine pollution incidents.

Port Authority has the role of Harbour Master in all commercial ports in NSW. Each Harbour Master is appointed under section 85 of the *Marine Safety Act 1998* (NSW). The general functions of a Harbour Master are outlined in section 88 of that Act and can be summarised as having 'powers to direct and control the movement, entry and exit of vessels within port areas'. Port Authority is also the lead agency for responding to maritime incidents in coastal waters stretching from Fingal Head, Port Stephens, to Gerroa, south of Port Kembla.

Port Authority has a governance function under the Hunter Coal Export Framework and is a member of the Hunter Valley Coal Chain.

Port Authority owns and manages key NSW assets, including common user berths at Glebe Island and White Bay in Sydney Harbour and lands of community significance in Newcastle (Nobbys Head and Macquarie Pier). Port Authority also provides land on long-term lease adjacent to berths at Glebe Island.

Port Authority owns and manages cruise facilities at the Overseas Passenger Terminal (**OPT**) at Circular Quay, White Bay Cruise Terminal at Balmain and the cruise wharf and Welcome Centre in Eden.

Port Authority is subject to various pieces of legislation that provide rights and impose obligations affecting its governance processes and commercial and operational activities.

2.3 Supply Chains

In FY26 Port Authority's expenditure spans a broad range of categories, the majority of which are assessed as having low residual modern slavery risk, including inter-agency payments, professional services, insurance, utilities and fuel.

Notwithstanding this assessment, Port Authority acknowledges that inherent modern slavery risk remains present within its supply chains, including where goods and services are sourced through subcontracting arrangements, upstream manufacturing, or offshore labour inputs.

Categories assessed as having elevated inherent risk characteristics include:

- Security services
- Facilities management including cleaning
- Materials used for construction and maintenance
- Apparel and Promotional Merchandise (eg. uniforms, polo shirts)
- Technology services and equipment

Key risk drivers across these categories include:

- Subcontracting: reliance on multi-tier supply chains with limited visibility beyond head contractor (Tier 1) suppliers
- Labour models: use of migrant, casual or temporary labour in service delivery
- Offshore inputs: exposure to offshore manufacturing or service delivery in higher-risk geographies
- Complexity: large or complex contracts with extended supply chains

Port Authority continues to strengthen its understanding of these risks through procurement-led due diligence processes and ongoing improvements to supplier and contract management practices in collaboration with the Legal team.

3 Modern Slavery Risks

3.1 Risk Assessment Approach

Port Authority applies a risk-based approach to addressing modern slavery in its operations and supply chains via:

- Analysis of expenditure categories and supplier profiles
- Procurement due diligence findings
- Identification of high and moderate risk categories through the inherent risk identification tool.
- Intelligence from industry bodies, the NSW Anti-Slavery Commissioner, and the Australian Border Force

3.2 Risk Profile

Port Authority's major categories of procurement in FY26 included security services, helicopter marine pilot transfer services, vessel design and construction, construction contractors, plant and equipment, repairs and maintenance, cleaning and waste services, IT, insurance, utilities, fuel and advisory and consultancy services.

Category	Inherent risk drivers	Residual risk after controls	FY27 focus
Security services	Labour-intensive services, subcontracting, casual workforce exposure	Medium	Annual revalidation of moderate/high risk suppliers, steps to increase subcontractor visibility, increasing workforce education on workplace rights
Cleaning / facilities management	Labour hire, low-margin service delivery, potential migrant worker exposure	Low–Medium	Enhanced due diligence and contract management reviews
Construction and maintenance	Subcontracting, materials supply chains, project-based labour	Low	Supplier declarations and pass-through obligations to subcontractors

Port Authority recognises that elevated inherent risks exist across several categories of procurement—particularly where subcontracting and/or upstream supply chain activities are present.

Subcontracting arrangements represent the most significant area of ongoing risk, as Port Authority has comparatively limited visibility beyond Tier 1 suppliers. This is a key focus area for continued risk mitigation and enhanced due diligence within the FY27 procurement program.

4 Actions Taken to Address Modern Slavery Risks

4.1 Procurement Controls & Due Diligence

Port Authority predominantly manages modern slavery risks through its procurement framework, which embeds risk-based due diligence and governance controls across the sourcing lifecycle.

Key controls include:

Procurement governance and visibility

- Centre-led procurement model

- Procurement pipeline of upcoming projects
- Procurement Reference Number intake process
- Procurement ‘source-of-truth’ - centralised documentation site

Supplier and contract controls

- Centralised contracts register
- Supplier Code of Conduct update
- Business Ethics Statement update
- Inaugural Sustainability Report
- Modern slavery contract clauses, taking guidance from the NSW Anti-Slavery Commissioner’s model

Risk assessment and supplier revalidation

- Use of NSW Government GRS Inherent Risk Identification Tool
- Revalidation of moderate / high-risk suppliers with multi-year contracts
- Updated supplier declarations and risk ratings

Capability and awareness

- Online training modules
- Procurement policy and process guidance
- Sourcing channel quick reference guides

FY26 outcomes

- One investigation which included allegations of modern slavery-related matters which resulted in no modern slavery-related findings
- No issues raised by the NSW Anti-Slavery Commissioner

These controls are being further strengthened as part of Port Authority's transition to a Centre-Led procurement operating model, which enables increased oversight and consistency across all supplier engagement activities.

4.2 Remediation and Escalation Process

Port Authority recognises that effective modern slavery risk management requires clear escalation and remediation processes where a potential concern is identified.

Where Port Authority identifies a potential modern slavery concern through procurement due diligence, supplier engagement, contract management, audit activity, whistleblower reporting or other channels, the matter will be escalated to Procurement, Legal, Risk and/or relevant business owners for assessment.

Depending on the nature and severity of the concern, Port Authority may seek further information from the supplier, require a corrective action plan, increase monitoring, restrict or suspend further engagement, or exercise contractual rights where appropriate. Matters may also be referred to the appropriate regulatory authorities, including the Fair Work Ombudsman, where appropriate.

Port Authority’s response will prioritise the safety, dignity and wellbeing of affected persons and seek to avoid actions that may unintentionally worsen harm. Where appropriate, Port Authority will work with suppliers to support corrective action and improved controls, while reserving the right to take stronger action in cases of serious, unresolved or systemic non-compliance.

4.3 Policy and Governance

Port Authority's governance framework for modern slavery includes:

- Procurement Policy, Procedures and Procurement Strategy
- Supplier Code of Conduct
- Business Ethics Statement
- Public Interest Disclosure Policy
- Maintaining a Speak Up reporting hotline
- Enterprise Risk Management Framework

4.4 Training and Awareness

Port Authority provides modern slavery training and awareness to relevant staff, including:

- Online training modules for procurement and contract management staff
- Induction materials for new employees in relevant roles
- Reference guidance within procurement process and training documentation

4.5 Outcomes Achieved in FY26

During FY26, Port Authority strengthened its modern slavery risk management approach through the following key activities:

- Applied modern slavery due diligence questionnaires to applicable procurements above $50,000.
- Reviewed and updated the Supplier Code of Conduct and Business Ethics Statement to further address modern slavery expectations.
- Developed online modern slavery training modules for relevant staff.
- Used the NSW Government GRS Inherent Risk Identification Tool to identify moderate/high inherent risk suppliers.
- Revalidated modern slavery declarations for relevant moderate/high risk suppliers with multi-year contracts.
- Updated supplier risk ratings in the centralised contracts register.
- Continued implementation of a centre-led procurement model to improve visibility, consistency and compliance across supplier engagement.

No material modern slavery incidents were identified within Port Authority's direct operations or Tier 1 contractors during FY26. Concerns relating to payroll management of a particular Tier 1 contractor's subcontractor were identified, with that subcontractor ultimately being referred to the Fair Work Ombudsman. Port Authority considers that increasing visibility into sub-tier supply chains remains a focus area for FY27.

5 Assessment of the Effectiveness of Actions

Port Authority assesses the effectiveness of its modern slavery risk management approach through a combination of qualitative and quantitative measures, including:

- monitoring the implementation of procurement controls designed to address modern slavery risks within supply chains, including supplier questionnaires and declarations;
- reviewing reports, complaints, disclosures reports or other concerns that may indicate the presence of modern slavery risks or related issues;

- assessing information obtained through supplier engagement, due diligence activities and contract management processes; and
- reviewing modern slavery-related policies, procedures and governance arrangements in line with Port Authority's policy review schedule to ensure they remain fit for purpose and aligned with legislative requirements and emerging best practice.

During FY26, Port Authority continued to strengthen its modern slavery framework through the implementation of enhanced procurement controls, updated governance documents and modern slavery awareness initiatives. As the maturity of its modern slavery risk management program develops, Port Authority will continue to enhance its assessment approach.

6 Consultation with Controlled Entities

Port Authority does not own or control any entities. Accordingly, the consultation requirement under criterion 16(1)(f) of the Modern Slavery Act 2018 (Cth) does not apply.

Port Authority's Modern Slavery Statement is prepared in consultation with the finance and legal divisions and the Audit and Risk Committee prior to being presented to the Board for approval.

7 Future Actions and Maturity Roadmap

7.1 FY27 Priority Initiatives

The following initiatives have been identified as priorities for FY27:

FY27 priority	Intended outcome	Lead function
Annual revalidation of medium/high-risk suppliers	Improved assurance over higher-risk suppliers	Procurement / Legal
Model tender and contract clauses	Stronger contractual protections and subcontractor flow-down obligations taking guidance from the NSW Anti-Slavery Commissioner's GRS guidance	Procurement / Legal
Supplier Code of Conduct sign-off	Broader supplier acknowledgement of Port Authority's expected labour, ethical sourcing and modern slavery standards	Procurement / Legal
Modern slavery training delivered to wider organisation	Improved staff capability and awareness	Procurement / People & Culture / Legal
Policy uplift	Update of Procurement Policy and Procedures provide greater Procurement oversight where appropriate and ensure due diligence is systematically applied	Procurement / Finance
Spend and supplier dashboard	Improved visibility of supplier base and new vendors	Procurement / Finance
Centralised modern slavery folder	Dedicated online folder for supplier documentation	Procurement

Modern Slavery Maturity Model

Maturity Level	Description	Port Authority Status
1 — Policy Foundation	Policy commitments, basic training, supplier undertakings	Achieved (FY24–25)
2 — Process Integration	Questionnaire-based due diligence, procurement controls, outcome reporting, supplier segmentation	Current (FY26)
3 — Risk-Based Management	Category-level mapping, quantitative KPIs	Target (FY27)
4 — Continuous Monitoring	Data-driven monitoring, S2P integration, supply chain analytics	Aspirational (FY28+)

8 Approval of Statement

This Modern Slavery Statement for FY26 has been approved by the Board of Port Authority of New South Wales (ABN 50 825 884 846) on: 25 August 2026

This statement was prepared in accordance with section 16 of the *Modern Slavery Act 2018 (Cth)* and covers the mandatory reporting criteria set out in that section.



John McKenna

Chief Executive Officer

for and on behalf of

Port Authority of New South Wales

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